# **EXHIBIT D**

# Rivera v. Home Depot File No. 930-83092 Billing Summary

Attorney	Hours	Billed
Arturo Boutin	267.3	\$46,777.50
Robert D. Lang	51.8	\$9,065.00
Laurie Beatus	91	\$11,830.00
Henry C. Dieudonne	40.8	\$5,304.00
Paralegals	131.3	<u>\$9,847.50</u>
		Total \$82,824.00

930 83092

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Atlanta, GA 30339-4024

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 559936

January 11, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc
Claimant : Daniel Rivera

Our Tax I.D. No. : 13-2916296 Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

Previous Outstanding Balance

\$ .00

Fees for Professional Services Through December 31. 2016 \$ 1.792.50

AMOUNT HOURS RATE ATTORNEY 1,190.00 6.80 175.00 Arturo Boutin 130.00 195.00 1.50 Henry C. Dieudonne 7.50 75.00 .10 Megan Kessig 227.50 175.00 1.30 Robert D. Lang 172.50 75.00 2.30 Helen McDonald \$ 1,792.50 12.00

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 559936

January 11, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

To legal services rendered and disbursements advanced during the period of December 5, 2016 through December 31, 2016; such legal services consisting of the following:

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
12/05/16	RDL	175.00	.20	L120	A104	Review and analysis of the December 5th email to Becky Popson regarding new case assignment;
12/05/16	RDL	175.00	.10	L120	A103	
12/05/16	RDL	175.00	.10	L120	A104	Review and analysis of November 7, 2016 notification from the New York State Division of Corporations regarding service of the summons and complaint on Home Depot, provided by Becky Popson;
12/05/16	RDL	175.00	.10	L210	A104	Review and analysis of September 27, 2016 Summons, provided by Becky Popson;
12/05/16	RDL	175.00	.20	L210	A104	Review and analysis of the two page disclosure by plaintiff regarding lawsuit filing, provided by Becky Popson;
12/05/16	RDL	175.00	30	L210	A104	Review and analysis of September 22,

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	ice#	559936			J	January 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
12/05/16	НЈМ	75.00	.20	L210		2016 twenty numbered paragraph complaint, provided by Becky Popson; Telephone conference with Plaintiff's Counsel regarding a Stipulation Extending Time to Answer the Summons and Complaint in lieu of default
12/05/16	НЈМ	75.00	.20	L210		judgment; Draft Stipulation Extending Time to Answer the Summons and Complaint in lieu of default judgment;
12/05/16	HJM	75.00	.10	L210		Finalize Stipulation Extending Time to Answer the Summons and Complaint in lieu of default judgment;
12/06/16	НЈМ	75.00	.20	L210		Further telephone conference with Anna of Plaintiff's Counsel regarding
12/06/16	HJM	75.00	.20	L210		execution of Stipulation Extending Time to Answer the Summons and Complaint; Further telephone conference with Anna of Plaintiff's Counsel regarding execution of Stipulation Extending Time to Answer the Summons and
12/06/16	HJM	75.00	.10	L210		Complaint; Review and analysis of partially executed Stipulation Extending Time to Answer the Summons and Complaint;
12/07/16	RDL	175.00	.20	L210	A103	Draft report to Becky regarding January 6th date by signed stipulation to answer the summons and complaint, with the stipulation to be "So Ordered" by the federal judge;
12/08/16	RDL	175.00	.10	L110	A104	Review and analysis of email from Becky regarding documents on the job to be provided to us tomorrow;
12/08/16	5 AMB	175.00	.10	L120		Analysis of 12/8/16 correspondence from Becky Popson, copy to me re: status of Home Depot's relevant case documents for preparation of its

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	559936			·	January 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
12/08/16	HJM	75.00	.10	L210		liability and damages defense; Review and analysis correspondence from District Court Clerk regarding the Stipulation Extending Time to
12/08/16	НЈМ	75.00	.20	L210		Answer the Summons and Complaint; Telephone conference with Anna of Plaintiff's Counsel's office regarding correspondence received from District Court Clerk regarding the execution of the Stipulation Extending Time to Answer the Summons
12/08/16	НЈМ	75.00	.10	L210		and Complaint; Correspondence to Anna of Plaintiff's Counsel's office regarding correspondence received from District Court Clerk regarding the execution of the Stipulation Extending Time to
12/08/16	НЈМ	75.00	.10	L210		Answer the Summons and Complaint; Review and analysis of correspondence from Anna of Plaintiff's Counsel's office regarding correspondence received from District Court Clerk regarding the execution of the Stipulation Extending Time to Answer
12/08/16	НЈМ	75.00	.10	L210		the Summons and Complaint; Further correspondence to Anna of Plaintiff's Counsel's office regarding correspondence received from District Court Clerk regarding the execution of the Stipulation Extending Time to Answer the Summons
12/08/16	НЈМ	75.00	.20	L210		and Complaint; Electronically file Notice of Appearance for Arturo Boutin in with the United States District Court of New York, Southern District of New York (1 page);
12/08/16	HJM	75.00	.10	L210		Electronically file Notice of

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	559936	January 11, 2017
DATE ATTY	RATE HOURS TASK A	CT'Y
12/08/16 HJM	75.00 .10 L210	Appearance for Robert D. Lang with the United States District Court of New York, Southern District of New York (1 page); Electronically file Notice of Appearance for Henry Dieudonne with the United States District Court of New York, Southern District of New York,
12/08/16 HJM	75.00 .10 L210	York (1 page); Review and analysis revised fully executed Stipulation Extending Time to Answer the Summons and Complaint
12/08/16 HJM	75.00 .20 L210	pursuant to Clerk of the Court's instructions; Correspondence to the Clerk of the Court regarding the fully executed Stipulation Extending Time to Answer
12/09/16 AMB	175.00 .70 L120	the Summons and Complaint pursuant to Clerk of the Court's instructions; Analysis of 12/9/16 correspondence from Becky Popson re: HD lead notes concerning work at loss premises and preliminary information on
12/09/16 AMB	175.00 .30 L120	plaintiff's alleged accident; Drafting report to Becky Popson re:
12/09/16 AMB	175.00 .10 L120	Analysis of 12/9/16 correspondence from Becky Popson re: agreement with our recommendation
12/09/16 AMB	175.00 .10 L120	Analysis of 12/9/16 correspondence

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	559936			Ċ	January 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
						from Becky Popson to associate Jorge Palacios, copy to me re:
12/09/16	5 AMB	175.00	.10	L120		Drafting correspondence to associate Jorge Palacios re:
12/09/16	5 AMB	175.00	.10	L120		Analysis of 12/9/16 correspondence from associate Jorge Palacios re:
12/09/16	5 AMB	175.00	.10	L120		Drafting response to 12/9/16 correspondence from associate Jorge Palacios re:
12/09/16	5 AMB	175.00	.40	L120		Authorized telephone conference with associate Jorge Palacios re:
12/09/16	5 AMB	175.00	.90	L120		Drafting report to Becky Popson re: 12/9/16 authorized telephone conference with associate Jorge Palacios

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	Lce#	559936			Ċ	January 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
12/09/16	AMB	175.00	.10	L120		Analysis of 12/9/16 correspondence from Becky Popson re:
12/13/16	HCD	130.00	1.50	L210		Prepared answer with affirmative defenses;
12/15/16	AMB	175.00	.40	L120		Analysis of 12/15/16 correspondence from Becky Popson re: request to tender HD's defense to vendor Bryans
12/22/16	AMB	175.00	.40	L120		Home Improvement and end date to implead it as a party; Drafting report to Becky Popson re: authorized tender of HD's defense to vendor Bryans Home Improvement and end date to implead it as a party;
12/22/16	AMB	175.00	.10	L210		Drafting additions to Home Depot Stipulation of Confidentiality;
12/22/16	AMB	175.00	.10	L320		Drafting additions to Home Depot's First Set of Interrogatories;
12/22/16	AMB	175.00	.10	L320		Drafting additions to Home Depot's First Request for Production of
12/22/16	AMB	175.00	.10	L320		Documents; Drafting additions to Home Depot's Request for Medicare/Medicaid information;
12/22/16	AMB	175.00	.10	L330		Drafting additions to Home Depot's Notice for Deposition;
12/22/16	AMB	175.00	.60	L120		Drafting authorized tender letter to vendor Bryans Home Improvement Corp.
12/23/16	AMB	175.00	.10	L210		re: tender of Home Depot's defense; Analysis of 12/23/16 correspondence from Becky Popson, copy to me re: approved Home Depot Answer and
12/23/16	AMB	175.00	.10	L120		discovery requests; Analysis of 12/23/16 correspondence from Becky Popson re: authority to serve tender letter to vendor Bryan's

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	lce#	559936			j	January 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
12/23/16	MXK	75.00	.10	L140		Home Improvement Corp.; Uploaded and filed an answer in this case via SDNY;
12/27/16	AMB	175.00	.10	L120		Analysis of 12/27/16 correspondence from Becky Popson, copy to me re:
12/27/16	AMB	175.00	.10	L120		authority to overnight tender letter to vendor Bryan's Home Improvement Corp.; Analysis of 12/27/16 correspondence from Becky Popson, copy to me re: authority to proceed with third-party action as against vendor Bryan's Home
12/27/16	AMB	175.00	.10	L120		Improvement Corp.; Telephone call to Becky Popson re:
12/27/16	AMB	175.00	.10	L120		Analysis of 12/27/17 correspondence from Becky Popson re: state
12/27/16	AMB	175.00	.10	L120		Drafting additions to authorized tender to vendor Bryans home Improvement Corp. re: Becky Popson's
12/28/16	AMB	175.00	.70	L120		12/27/16 request for a response by 1/5/17; Analysis of 12/28/16 correspondence from Becky Popson re: Home Depot Service Provider Agreement with
12/28/16	AMB	175.00	.10	L120		vendor Bryan's Home Improvement Corp. to press Home Depot's defense tender; Drafting additions to authorized tender to vendor Bryans Home Improvement Corp. re: inclusion of Service Provider Agreement received
12/28/16	AMB	175.00	.20	L120		from Becky Popson on 12/28/16; Drafting report to Becky Popson re:

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	559936			Ū	January 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
12/29/16	AMB	175.00	.10	L230		Analysis of 1/30/17 Initial Court Conference re: preparation for drafting Home Depot's Automatic
12/30/16	AMB	175.00	.10	L230		Disclosure and appearance at Conference; Drafting report to Becky Popson re:
TOTAL FI	EES					\$ 1,792.50

DATE RATE		UNITS	TASK	NT EXPENSE NAME
12/08/16 12/27/16 12/27/16 12/27/16	.10 .10 .10	2.00 26.00 13.00	E101 E101 E101 E105	.20 Duplicating 2.60 Duplicating 1.30 Duplicating .08 Long Dist. Tel., Extn
12/27/16			E105	(OUTGOING), Phone#: (770) 433-8211 .16 Long Dist. Tel., Extn (OUTGOING), Phone#: (770)
12/28/16 12/28/16	.10	84.00 41.00	E101 E101	433-8211 8.40 Duplicating 4.10 Duplicating

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 12 of 215

930 83092

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Atlanta, GA 30339-4024

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 560850 February 15, 2017

Home Depot GLSL Rtnr/Rivera, Daniel RE:

Litigation No. : GL-16-11-17780

: TBP Claim No. : TBP Date of Loss

: Ms. Becky R. Popson Examiner : Home Depot U.S.A.Inc Defendant

: Daniel Rivera Claimant Our Tax I.D. No. : 13-2916296 Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

\$ .00 Previous Outstanding Balance

Fees for Professional Services Through January 31, 2017 \$ 2,397.50

ATTORNEY	HOURS	RATE	AMOUNT
Arturo Boutin Henry C. Dieudonne Megan Kessig Robert D. Lang Jerome Smith	12.00 .50 .20 .60 1.50	175.00 130.00 75.00 175.00 75.00	2,100.00 65.00 15.00 105.00 112.50
	14.80		\$ 2,397.50

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 560850 February 15, 2017

Home Depot GLSL Rtnr/Rivera, Daniel RE:

Litigation No. : GL-16-11-17780

Claim No. : TBP : TBP Date of Loss

: Ms. Becky R. Popson Examiner : Home Depot U.S.A.Inc Defendant

: Daniel Rivera Claimant Our Tax I.D. No. : 13-2916296 Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

To legal services rendered and disbursements advanced during the period of January 4, 2017 through January 31, 2017 ; such legal services consisting of the following:

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
1/04/17	AMB	175.00	.40	L210		Drafting SDNY Summons on authorized third-party action against vendor Bryan's Home Improvement Corp.;
1/04/17	AMB	175.00	2.40	L210		Drafting Complaint re: authorized third-party action against vendor Bryan's Home Improvement Corp.;
1/05/17	AMB	175.00	.10	L210		Drafting report to Becky Popson re:
1/05/17	AMB	175.00	<sub>2</sub> .10	L210		Analysis of 1/5/17 correspondence from Becky Popson re:
1/05/17	JXS	75.00	.30	L140		Review S&C, with Third Part Complaint to comply with Federal and ECF/CM.
1/06/17	AMB	175.00	.10	L210		e-filing rules, Analysis Court issued Summons re:

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

マヘヤ	T. WCAT.	SERVICES

Invo	ice#	560850			Ŧ	ebruary 15, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
1/06/17	AMB	175.00	.10	L210		authorized third-party action against vendor Bryan's Home Improvement Corp.; Drafting report to Becky Popson re:
1/06/17	AMB	175.00	.10	L320		Drafting correspondence to Jorge Palacios re:
1/06/17	AMB	175.00	.30	L210		Drafting Day Case Status report re:
1/06/17	AMB	175.00	.20	L310		Drafting additions to Home Depot's Rule 26 Automatic Disclosure re: third-party action as against vendor Bryan's Home Improvement Corp.;
1/06/17	HCD	130.00	. 50	L310		Preparation of Rule 26 Automatic Disclosure per federal court rules;
1/10/17	JXS	75.00	. 40	L140		Review defendant HD's Rule 26 automatic disclosure to comply with FRCP ECF/CM e-filing rules, e-filed said document:
1/19/17	AMB	175.00	.10	L120		Analysis of 1/19/17 correspondence from Becky Popson re:

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoi	ice#	560850			]	February 15, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
1/19/17	AMB	175.00	.20	L120		Drafting response to 1/19/17 correspondence from Becky Popson re:
						· · · - =
1/24/17	JXS	75.00	.60	L140		Review AOS of Brayn's Home Improvement dated 1/12/17 and substituted service upon Secretary of State dated 1/19/17, E-filed said document with USDC SDNY, docket due date for THPD to move or answer THP
1/25/17	AMB	175.00	<sub>.</sub> ,10	L210		Summons on 2/2/17: Analysis of filed proof of Service re: Home Depot's Third-Party Summons and Complaint against third-party defendant Bryan's Home Improvement
1/25/17	AMB	175.00	.10	L210		Corp.; Analysis of Affidavit of Service on NY Secretary of State re: Home Depot's Third-Party Summons and Complaint against third-party defendant Bryan's Home Improvement
1/25/17	AMB	175.00	.40	L210		Corp.; Drafting report to Becky Popson re:

4

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	560850				February 15, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
1/25/17	JXS	75.00	.20	L140		Review FRCP 4(e)(2) to compute due date for THPD Bryan to move or answer THP S&C, due date to answer is
1/26/17	AMB	175.00	.10	L210		2/20/17: Analysis of 1/26/17 vm request from NYSIF examiner Edward Siegel re: telephone conference concerning Home Depot's third-party action as against
1/26/17	AMB	175.00	.10	L210		vendor Bryan's Home Improvement Corp.; Telephone conference with NYSIF examiner Edward Siegel re: Home Depot's third-party action as against vendor Bryan's Home Improvement Corp.
						and his request to discontinue Home Depot's common law contribution claim under Worker's Compensation Law Sec. 11;
1/26/17	AMB	175.00	.10	L210		Analysis of 1/26/17 vm request from NYSIF examiner Edward Siegel re:
4:						
1/26/17	AMB	175.00	.10	L210		Telephone conference with NYSIF examiner Edward Siegel re: notice that Arch Specialty Insurance Company denied during his telephone conference with them that they were third-party defendant Bryan's Home Improvement Corp.'s general liability carrier on the date of loss;
1/26/17	AMB	175.00	.10	L210		Analysis of 1/26/17 correspondence from Becky Popson re:

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR LEGAL SERVICES

February 15, 2017 Invoice# 560850

HOURS TASK ACT'Y DATE ATTY RATE

carrier Arch Specialty Insurance; Defense strategy telephone conference 1/26/17 AMB 175.00 .20 L210

with Becky Popson re:

175.00 .70 L210 Drafting report to Becky Popson re: 1/26/17 AMB

1/27/17 RDL 175.00 .10 L210 A104 Review and analysis of the January 27, 2016 Notice of Appearance on behalf of additional counsel for plaintiff Daniel Rivera;

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	560850			Ι	February 15, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
1/27/17	MXK	75.00	.20	L140		Called plaintiff's counsel in order to confirm their appearance at the conference on Monday 1/30, they said someone would be appearing from their office, I advised the handling attorneys;
1/30/17	RDL	175.00	.10	L230	A104	Review and analysis of court report regarding initial pre-trial conference with status conference to be held on August 2, 2017;
1/30/17	AMB	175.00	.50	L230		Preparation for appearance at Initial Conference re: status of plaintiff's discovery responses and Automatic Disclosure, Home Depot's third-party action as against vendor Bryan's Home Improvement Services and addressing its liability and defense tender;
1/30/17	AMB	175.00	2.10	L230		Travel to and from Southern District Courthouse, White Plains, NY re: appearance at Initial Conference; (half time)
1/30/17	AMB	175.00	.90	L230		Appearance in Southern District Courthouse, White Plains, NY re: appearance at Initial Conference, travel time not included;
1/30/17	AMB	175.00	.10	L120		Analysis of 1/30/17 correspondence from Becky Popson ;
1/30/17	AMB	175.00	.10	L120		Drafting response to 1/30/17 correspondence from Becky Popson re:
1/30/17	AMB	175.00	.10	L210		Analysis of 1/30/17 telephone request from NYSIF counsel Mike Miliano, Esq. re: request for extension of time to Answer Home Depot's Third-Party Complaint against Bryan's Home

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	ice#	560850			I	February 15, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
1/30/17	AMB	175.00	.10	L210		Improvement Services, Corp.; Telephone conference with NYSIF counsel Mike Miliano, Esq. re: his request for extension of time to Answer Home Depot's Third-Party
1/30/17	AMB	175.00	.10	L210		Complaint against Bryan's Home Improvement Services, Corp.; Analysis of 1/30/17 correspondence from NYSIF counsel Mike Miliano, Esq. re: his request for extension of time to Answer Home Depot's Third-Party
1/30/17	AMB	175.00	.10	L210		Complaint against Bryan's Home Improvement Services, Corp.; Telephone call to NYSIF counsel Mike Miliano, Esq. re: request for information on Atlantic Casualty Insurance Co. concerning insurer information for third-party defendant
1/30/17	AMB	175.00	.20	L120		Bryan's Home Improvement Services, Corp.; Drafting authorized defense tender letter to Atlantic Casualty Insurance Co. re: Home Depot's defense tender to third-party defendant Bryan's Home
1/31/17	RDL	175.00	.20	L230	A104	Improvement Services, Corp.; Review and analysis of court report regarding civil case discovery plaintiff scheduling order entered
1/31/17	RDL	175.00	.20	L230	A104	before Judge Briccetti; Review and analysis of the January 31, 2017 Civil Case Discovery Plan and Scheduling Order all ordered by
1/31/17	AMB	175.00	.10	L210		Judge Briccetti, with expert depositions to be completed by July 24, 2017; Analysis of 1/31/17 telephone request from NYSIF counsel Mike Miliano, Esq. re: request for telephone conference

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	560850				February 15, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT ' Y	
1/31/17	AMB	175.00	.10	L210		on NYSIF insurance coverage for Third-Party Defendant Bryan's Home Improvement Services, Corp.; Telephone conference with NYSIF counsel Mike Miliano, Esq. re: notice that NYSIF insurance coverage for Third-Party Defendant Bryan's Home Improvement Services, Corp. includes Worker's Compensation benefits and
1/31/17 1/31/17						common law negligence claim, a s well as authorized exchange of information on Atlantic Casualty Insurance Co. to press Home Depot's defense tender; Telephone conference with NYSIF counsel Mike Miliano, Esq. re: notice that Atlantic Casualty Insurance Co. confirms coverage for third-party defendant Bryan's Home Improvement Services for the date of loss; Drafting report to Becky Popson re;
, ,						
						i.
1/31/17	AMB	175.00	.10	L230		Analysis of 1/31/17 correspondence from Becky Popson re:

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

HOD	TROST	SERVICES
M. LIK	LINGLIAL	SERVICES

Invoice# 560850 February 15, 2017	
DATE ATTY RATE HOURS TASK ACT'Y	
1/31/17 AMB 175.00 .10 L210 Drafting correspondence counsel Mike Miliano, authorized extension to defendant Bryan's Home Services to answer Home	Esq. re: o third-party Improvement be Depot's
third-party Complaint 1/31/17 AMB 175.00 .10 L230 Drafting response to 1 correspondence from Be	./31/17
1/31/17 AMB 175.00 .10 L120 Analysis of plaintiff' Notice of Change of Ad	ldress dated
1/30/17 re: 1/30/17 di Court;	rective from \$ 2,397.50

DATE RATE	UNITS	TASK	NT EXPENSE NAME
1/01/17		E118	22.83 Courier Service - UPS - Date: 12-27-2016 - Sender: Arturo M. Boutin - Receiver: Giovanni Saravia of Arch Specialty Insurance Co., Haverstraw, NY
1/01/17		E118	22.83 Courier Service - UPS - Date: 12-27-2016 - Sender: Arturo M. Boutin - Receiver: Bryans Home

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR	T POST.	SERVICES
PUR	LEGAL	PEKATCES

Invoice#	560850	Fe	bruary 15,	2017
DATE RATE	UNITS	TASK	NT EXP	ENSE NAME
1/01/17		E118	22.83	Improvement Corp., Spring Valley, NY Courier Service - UPS - Date: 12-28-2016 - Sender: Arturo M. Boutin - Receiver: Giovanni Saravia
1/01/17		E118	22.83	of Arch Specialty Insurance Co., Haverstraw, NY Courier Service - UPS - Date: 12-28-2016 - Sender: Arturo M. Boutin - Receiver: Bryans Home
1/01/17		E118	13.40	Improvement Corp., Spring Valley, NY Courier Service - UPS - Date: 12-27-2016 - Sender: Arturo M. Boutin - Receiver: Bryans Home
1/03/17 1/03/17 1/03/17 1/05/17 1/05/17 1/05/17 1/05/17 1/05/17 1/05/17 1/05/17 1/05/17 1/05/17 1/05/17 1/05/17	.10 2.00 .10 7.00 .10 36.00 .10 60.00 .10 7.00 .10 7.00 .10 58.00 .10 1.00 .10 58.00 .10 33.00 .10 33.00 .10 1.00 .10 58.00	E101 E101 E101 E101 E101 E101 E101 E101	.20 .70 3.60 6.00 .70 .70 5.80 .10 5.80 .70 1.00 .80 3.30 .10 5.80	Improvement Corp., Spring Valley, NY - Note: UPS Address Correction Duplicating

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	560850			February	15,	2017
DATE RATE	Ŭ	NITS	TASK	NT	EXP	ENSE NAME
1/06/17 1/06/17 1/06/17 1/10/17 1/10/17 1/13/17 1/13/17	.10 .10 .10 .10 .10	1.00 59.00 48.00 24.00 13.00 1.00	E101 E101 E101 E101 E101 E101 E107	5. 3. 4. 2. 1.	.10 .90 .04 .80 .40 .30 .10	Duplicating
1/15/17			E118	246.	.00	Package not picked up by receiver at UPS facility Jordosh Enterprises, LLC - Invoice No. 0804 - 01-15-2017 - As Per Stephen F. Willig
1/26/17			E105		64	Long Dist. Tel., Extn (OUTGOING), Phone#: (770)
1/26/17			E109	23,	.00	Transportation - 01-23-2017 - Travel to and from Sourthern District of New York in White Plains via Metro-North Railroad and Subway - Purpose: Initial Conference - As Per Arturo

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 24 of 215

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR LEGAL SERVICES

Invoice# 560850

February 15, 2017

930 83092

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Atlanta, GA 30339-4024

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 561577

March 20, 2017

Home Depot GLSL Rtnr/Rivera, Daniel RE:

Litigation No. : GL-16-11-17780

Claim No. : TBP

Date of Loss : TBP Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc
Claimant : Daniel Rivera

Our Tax I.D. No. : 13-2916296 Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

Previous Outstanding Balance

\$ .00

Fees for Professional Services Through February 28, 2017 \$ 1,006.00

ATTORNEY	HOURS	RATE	AMOUNT
Arturo Boutin Henry C. Dieudonne Robert D. Lang	5.00 .20 .60	175.00 130.00 175.00	875.00 26.00 105.00
	5.80		\$ 1,006.00

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 561577

March 20, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

: TBP Claim No. : TBP Date of Loss

: Ms. Becky R. Popson Examiner Defendant : Home Depot U.S.A.Inc Claimant : Daniel Rivera

Our Tax I.D. No. : 13-2916296 Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

To legal services rendered and disbursements advanced during the period of February 1, 2017 through February 28, 2017; such legal services consisting of the following:

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
2/01/17	AMB	175.00	.10	L120		Telephone call to NYSIF counsel Mike Miliano, Esq. re: authorized Home Depot tender letter to Atlantic
2/01/17	AMB	175.00	.10	L120		Casualty Insurance Company; Analysis of 2/1/17 correspondence from NYSIF counsel Mike Miliano, Esq. re: NYSIF's tender to Atlantic Casualty Insurance Company and
2/01/17	AMB	175.00	.20	L120		request for 50/50 sharing in defense costs; Drafting correspondence to Atlantic Casualty Insurance Company re:
2/01/17	AMB	175.00	. 20	L120		Drafting report to Becky Popson re:
2/02/17	AMB	175.00	.10	L120		Analysis of 2/1/17 correspondence

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	Lce#	561577			March 20, 2017	
DATE	ATTY	RATE	HOURS	TASK	K ACT'Y	
2/02/17	AMB	175.00	<sub>3</sub> , 10	L120	from NYSIF counsel Mike Miliano, Escre: status of NYSIF's tender to Atlantic Casualty Insurance Company and request for 50/50 sharing in defense costs;  Drafting response to 2/1/17 correspondence from NYSIF counsel Mike Miliano, Esq. re: status of NYSIF's tender to Atlantic Casualty Insurance Company and request for	1.
2/02/17	AMB	175.00	.10	L120	50/50 sharing in defense costs;	
2/02/17	AMB	175.00	.10	L120	Drafting response to 2/1/17 correspondence from Becky Popson re:	:
2/02/17	AMB	175.00	.10	L120	from Atlantic Casualty Insurance Company examiner Diana Hammond re: request for a telephone conference t	
2/02/17	AMB	175.00	¥10	L120	Insurance Company examiner Diana Hammond re: her request for a telephone conference to discuss Home	3
2/02/17	AMB	175.00	.30	L120	Depot's tender; Preparation for 2/2/17 telephone conference with Atlantic Casualty Insurance Company examiner Diana Hammond re: authorized tender letter case information received from Jorge Palacios and 1/30/17 Initial Conference appearance;	
2/02/17	AMB	175.00	.30	L120		

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR	LEGAL SE	RVICES						
Invo	ice#	561577			M	March 20,	2017	
DATE	ATTY	RATE	HOURS	TASK	ACT'Y			
2/02/17	AMB	175.00	.20	L120		Diana Ham tender; Drafting Casualty Diana Ham	Insurance Company examinmond re: Home Depot's correspondence to Atlan Insurance Company examinmond re: her request for	tic ner or
2/03/17	AMB	175.00	.40	L120		Home Depo	copy of authorized 2/1/1 ot's tender; 30 Day Case Status repo oson :	
0/05/55				T. 1.0.0				
2/07/17	AMB	175.00	.10	L120		Popson re	conference with Becky	9
2/07/17	AMB	175.00	:10	L120			of 2/7/17 correspondenc y Popson re: .	e . )
						F	8, 22: 75.	·V
2/13/17	AMB	175.00	.10	L210		Connors & for third	of 2/13/17 request from Connors, incoming coun -party defendant Bryan'	sel s

Home Improvement Corp. re: request

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	561577			N	March 20, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
2/13/17	AMB	175.00	.10	L210		for 2/27/17 extension to serve its Answer; Telephone conference with Becky Popson re:
						3e6 e Y
2/13/17	AMB	175.00	.10	L210		Analysis of 2/13/17 correspondence from Connors & Connors, incoming counsel for third-party defendant Bryan's Home Improvement Corp., copy to me re: fully executed Stipulation extending its time to answer Home
2/13/17	AMB	175.00	.10	L210		Depot's Third-Party Complaint by 2/27/17; Drafting report to Becky Popson re:
						*
2/13/17	AMB	175.00	, 10	L210		Analysis of 2/13/17 correspondence from Connors & Connors, incoming counsel for third-party defendant Bryan's Home Improvement Corp., copy to me re: filing with Court of fully executed Stipulation extending its
2/13/17	AMB	175.00	.10	L210		time to answer Home Depot's Third-Party Complaint by 2/27/17; Analysis of 2/13/17 Notice of Appearance by Connors & Connors, P.C. re: representation of third-party defendant Bryan's Home Improvement Corp.;
2/13/17	AMB	175.00	.10	L210		Drafting report to Becky Popson re:

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	561577				March 20, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
						en e
2/13/17	HCD	130.00	.10	L390		; Telephone call from third-party defendant Bryans Home Improvement re:
2/13/17	HCD	130.00	.10	L390		answer to third-party complaint; Telephone call to third-party defendant Bryans Home Improvement re: stipulation to extend time to file
2/14/17	AMB	175.00	.10	L210		answer to third-party complaint; Analysis of 2/14/17 So Ordered Stipulation re: 2/27/17 extension for third-party defendant Bryan's Home Improvement Corp. to answer Home
2/23/17	RDL	175.00	.40	L110	A104	depot's Third-Party Complaint; Review and analysis of the 13 page February 16, 2016 certified letter from Atlantic Casualty Insurance company to defendant Bryan's Home Improvement Corporation regarding tender by Home Depot of the defense
2/24/17	RDL	175.00	.10	L120	A103	and declining coverage; Draft correspondence to Beckv
2/24/17	AMB	175.00	.10	L120		Analysis of 2/24/17 correspondence from Becky Popson re: Atlantic
2/24/17	AMB	175.00	.30	L120		Drafting response to 2/24/17 correspondence from Becky Popson re:

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	561577			]	March 20, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
2/24/17	AMB	175.00	.90	L120		on plaintiff's claimed injuries; Analysis of 2/16/17 correspondence from Atlantic Casualty Insurance re: declination of Home Depot's defense
2/27/17	AMB	175.00	.10	L120		tender and preparation for drafting authorized response; Analysis of 2/27/17 correspondence from Becky Popson re:
						# EE
2/27/17	AMB	175.00	.10	L120		Authorized telephone conference with NYSIF corporate counsel re: request
2/27/17	AMB	175.00	.10	L120		for copy of third-party defendant Bryan's Home Improvement Atlantic Casualty Insurance policy and information on plaintiff's claimed injuries; Telephone call to counsel for third-party defendant Bryan's Home
						Improvement re: request for copy of its Atlantic Casualty Insurance policy and information on plaintiff's claimed injuries;
2/28/17	RDL	175.00	.10	L210	A104	Review and analysis of the January 23, 2017 affidavit of William Wittenagen regarding service of our Third-party Summons and Complaint on third-party defendant Boyan's Home Improvement Corp.;
TOTAL FI	EES	NO NO NO NOONOONOON ON O				\$ 1,006.00

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 561577

March 20, 2017

DATE RATE	UN	ITS	TASK	NT EX	PENSE NAME
2/03/17			E113	196.00	Process Service - Preemptive Process Servers - Invoice No. 10917-80 - Date of Service: 01-12-2017 - As Per Stephen F. Willig
2/04/17			E107	27.06	Courier Service - UPS - Date: 02-01-2017 - Sender: Arturo M. Boutin - Receiver: Atlantic Casualty Insurance Co., Goldsboro, NC
2/04/17			E107	18.54	
2/04/17			E107	22.71	
2/04/17			E107	13.40	_ ·
2/07/17			E105	.40	
2/13/17 2/13/17	.10	1.00	E101 E101	.10	Duplicating Duplicating

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	561577		1	March 20, 20	17
DATE RATE	Ţ	UNITS	TASK	NT EXP	ENSE NAME
2/13/17 2/13/17	.10	7.00	E101 E105	.70 .08	Duplicating Long Dist. Tel., Extn (OUTGOING), Phone#: (770) 433-8211
2/18/17			E107	10.40	
2/24/17 2/24/17	.10	1.00 15.00	E101 E101	.10 1.50	Duplicating Duplicating

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 34 of 215

930 83092

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Atlanta, GA 30339-4024

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 562731

April 11, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP
Date of Loss : TBP

Examiner : Ms. Becky R. Popson Defendant : Home Depot U.S.A.Inc

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

Previous Outstanding Balance \$ .00

Fees for Professional Services Through March 31, 2017 \$ 417.50

ATTORNEY	HOURS	RATE	AMOUNT
Arturo Boutin Robert D. Lang Helen McDonald	1.10 1.20 .20	175.00 175.00 75.00	192.50 210.00 15.00
	2.50		\$ 417.50

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR LEGAL SERVICES

Invoice# 562731

April 11, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

To legal services rendered and disbursements advanced during the period of March 6, 2017 through March 31, 2017 ; such legal services consisting of the following:

DATE ATTY RATE HOURS TASK ACT'Y

3/06/17 AMB 175.00 .90 L120 Drafting 30 Day Case Status report to

Becky Popson re: Atlantic Casualty

3/06/17 AMB 175.00 .10 L120

Analysis of 3/6/17 correspondence from Becky Popson re:

2

\$ 417.50

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoid	ce#	562731			P	April 11, 2017
DATE A	ATTY	RATE	HOURS	TASK	ACT'Y	
3/07/17 2	AMB	175.00	.10	L120		Analysis of 3/7/17 telephone request from third-party defendant's counsel re: discussion on time to respond to
3/08/17	RDL	175.00	.30	L310	A104	Home Depot's Third-Party Complaint; Review and analysis of the March 8, 2017 Rule 7.1 Statement filed by third-party defendant;
3/08/17	RDL	175.00	.30	L210	A104	Review and analysis of the March 8, 2017 Verified Answer by third-party defendant to our Third-party Complaint with 4 affirmative defenses;
3/09/17	RDL	175.00	.10	L310	A104	Review and analysis of the March 8, 2017 correspondence from counsel for co-defendant to Judge Vincent Bricetti regarding new Rule 7.1 Statement to be filed with the court;
3/09/17	RDL	175.00	.20	L210	A103	Draft report to Becky Popson
3/21/17	RDL	175.00	.30	L310	A104	Review and analysis of the March 17, 2017 first set of interrogatories by third-party defendant directed to plaintiff;
3/24/17	MUH	75.00	.10	L140		Calculate the due date to respond to Third-Party Defendant's First Request for Production of Documents dated March 17, 2017 pursuant to the CPLR;
3/24/17	HJM	75.00	.10	L140		Calculate the due date to respond to Third-Party Defendant's FRCP Demand for Expert Information dated March 21, 2017 pursuant to the CPLR;

TOTAL FEES......

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 37 of 215

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR LEGAL SER	RVICES
---------------	--------

Invoice# 562731

April 11, 2017

NET FEES

\$ .00

DATE	RATE		UNITS	TASK	NT	EXP	ENSE NAME
3/01/1		.10	1.00	E101		.10	Duplicating
3/06/1	7	.10	5.00	E101		.50	Duplicating

930 83092

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Atlanta, GA 30339-4024

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

### FOR LEGAL SERVICES

Invoice# 563375

May 15, 2017

Home Depot GLSL Rtnr/Rivera, Daniel RE:

Litigation No. : GL-16-11-17780

: TBP Claim No. : TBP Date of Loss

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc
Claimant : Daniel Rivera

Our Tax I.D. No. : 13-2916296 Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

\$ .00 Previous Outstanding Balance

Fees for Professional Services Through April 30, 2017 \$ 192.00

ATTORNEY	HOURS	RATE	AMOUNT
Arturo Boutin Henry C. Dieudonne Robert D. Lang	.70 .40 .10	175.00 130.00 175.00	122.50 52.00 17.50
	1.20		\$ 192.00

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR LEGAL SERVICES

Invoice# 563375

May 15, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP
Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc
Claimant : Daniel Rivera

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

To legal services rendered and disbursements advanced during the period of April 6, 2017 through April 30, 2017 ; such legal services consisting of the following:

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
4/06/17	AMB	175.00	.50	L120		Drafting 30 Day Case Status report to Becky Popson re: joinder of issue by
						and the second s
4/07/17	RDL	175.00	.10	L210	A104	Review and analysis of the April 7, 2017 correspondence from Becky
4/07/17	AMB	175.00	.10	L120		Analysis of 4/7/17 correspondence from Becky Popson re:

Ms. Becky R. Popson

DATE RATE

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR	LEGAL SE	ERVICES			
Invo	ice#	563375			May 15, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y
4/07/17	AMB	175.00	.10	L120	Drafting response to 4/7/17 correspondence from Becky Popson re:
4/18/17	חכט	130.00	2.0	T 2 0 0	Corriery and analysis as this description
1/10/1/	neb	130.00	.20	ПЭЭО	Review and analysis of third-party defendant Bryan's Home Improvement's
4/18/17	HCD	130.00	.20	L390	<pre>discovery demands to plaintiff; Review and analysis of third-party defendant's demand for expert information to plaintiff;</pre>
TOTAL F	EES		80 0 0 0 0 0 0		\$ 192.00

TASK

UNITS

NT EXPENSE NAME

## Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 41 of 215

930 83092

\$ .00

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Atlanta, GA 30339-4024

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 564061

June 8, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

: TBP Claim No. : TBP Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc
Claimant : Daniel Rivera

Our Tax I.D. No. : 13-2916296 Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

Previous Outstanding Balance

Fees for Professional Services Through May 31, 2017 \$ 1,149.00

ATTORNEY	HOURS	RATE	TRUOMA
Arturo Boutín Henry C. Dieudonne Robert D. Lang Helen McDonald James Zhu	1.70 4.80 1.00 .20	175.00 130.00 175.00 75.00	297.50 624.00 175.00 15.00 37.50
	8.20		\$ 1,149.00

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

### FOR LEGAL SERVICES

Invoice# 564061

June 8, 2017

Home Depot GLSL Rtnr/Rivera, Daniel RE:

Litigation No. : GL-16-11-17780

: TBP Claim No. : TBP Date of Loss

: Ms. Becky R. Popson Examiner Defendant : Home Depot U.S.A.Inc Claimant : Daniel Rivera

Our Tax I.D. No. : 13-2916296 Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

To legal services rendered and disbursements advanced during the period of May 3, 2017 through May 31, 2017 ; such legal services consisting of the following:

DATE AT	TTY RATE	HOURS 7	TASK .	ACT'Y	
5/03/17 J	Z 75.00	.10 I	L320		Review and analysis of plaintiff's authorization to Bryan Home Improvement Corp. to ensure the
5/03/17 J	Z 75.00	. 10 I	L320		completeness and compliance; Review and analysis of plaintiff's authorization to New York State Insurance Fund to ensure the
5/03/17 J:	Z 75.00	.10 I	L320		completeness and compliance; Review and analysis of plaintiff's authorization to Newark Rehabilitation to ensure the
5/03/17 J	Z 75.00	.10 1	L320		completeness and compliance; Review and analysis of plaintiff's authorization to Specialty Surgery of Secausus to ensure the completeness
5/03/17 J	Z 75.00	.10 ]	L320		and compliance; Review and analysis of plaintiff's authorization to St. Joseph's Medical Center to ensure the completeness and

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	564061				June 8, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
5/03/17	HCD	130.00	.80	L390		compliance; Receipt and analysis of plaintiff's answers to defendant Home Depot's first and second set of discovery answers following review of discovery
5/03/17	HCD	130.00	.60	L390		demands; Review and analysis of records from the U.S. Department of Labor re: plaintiff's accident location;
5/03/17	HCD	130.00	3.0	L390		Review and analysis of medical records from specialty surgery of Secaucus;
5/03/17	HCD	130.00	.40	L390		Review and analysis of plaintiff's worker's compensation records;
5/03/17	HCD	130.00	1.20	L390		Review and analysis of voluminous physical therapy records from Newark Rehabilitation Center;
5/03/17	HCD	130.00	.40	L390		Review and analysis of medical records from Dr. Paul Ratzker of The Back Institute;
5/04/17	AMB	175.00	.40	L320		Drafting additions to 30 Day Case Status report re:
						*. .≇
5/04/17	HCD	130.00	.90	L390		Preparation of status report to Becky Popson of Home Depot
5/05/17	RDL	175.00	10	L110	A104	Review and analysis of 30 day case status report;
5/09/17	AMB	175.00	.10	L120		Analysis of 5/9/17 correspondence from Becky Popson,
5/20/17	RDL	175.00	.20	L110	A106	Telephone conference with Paul Kaplan and Becky Popson regarding

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	564061			ı	June 8, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
5/22/17	RDL	175.00	.40	L120	A104	Prepare for conference call by review of file, pleadings and discovery responses for assessment in preparation for conference call to discuss the case;
5/22/17	RDL	175.00	.30	L120	A104	Review proposed report on recommended reserves case assessment;
5/22/17	AMB	175.00	.60	L120		7
						status under third-party defendant's insurance policy re: preparation for advising Becky Popson per her 5/22/17
						er a keddi
5/22/17	AMB	175.00	.40	L120		Drafting report to Becky Popson re:
						American A A A
5/23/17	AMB	175.00	.10	L120		Analysis of 5/23/17 correspondence from Becky Popson re: our 5/22/17
5/23/17	AMB	175.00	.10	L120		Drafting response to 5/23/17 correspondence from Becky Popson re:

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	564061			ć	June 8	3,	2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y			
5/24/17	НЈМ	75.00	.20	L310		Couns	hc sel	es; one conference with Plaintiff's regarding obtaining ff's medical records;
5/30/17	HCD	130.00	.20	L190		Telep couns	hc el	one conference with plaintiff's Mike Edelman re: outstanding ery and depositions;
TOTAL F	EES	e e esestente e i	. A 12 153561502					\$ 1,149.00

DATE	RATE		UNITS	TASK	NT	EXPENSE	NAME
5/03/1 5/03/1 5/03/1 5/04/1	7 7 7	.10 .10 .10	11.00 54.00	E101 E101 E101 E101	1. 5.	10 Dup 40 Dup	licating licating licating licating

## Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 46 of 215

930 83092

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Atlanta, GA 30339-4024

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

### FOR LEGAL SERVICES

Invoice# 564614

July 14, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP
Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc
Claimant : Daniel Rivera

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

Previous Outstanding Balance \$ .00

Fees for Professional Services Through June 30, 2017 \$ 922.50

ATTORNEY	HOURS	RATE	AMOUNT
Arturo Boutin Henry C. Dieudonne Megan Kessig Robert D. Lang James Zhu	2.60 2.00 .30 .20 2.00	175.00 130.00 75.00 175.00 75.00	455.00 260.00 22.50 35.00 150.00
	7.10		\$ 922.50

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

### FOR LEGAL SERVICES

Invoice# 564614

July 14, 2017

Home Depot GLSL Rtnr/Rivera, Daniel RE:

Litigation No. : GL-16-11-17780

Claim No.

: TBP

Date of Loss

: TBP

RATE HOURS TASK ACT'Y

Examiner Defendant

: Ms. Becky R. Popson : Home Depot U.S.A.Inc

Claimant

: Daniel Rivera

Our Tax I.D. No. : 13-2916296

Our File No. : 930-83092(005)

INTERIM BILL

ATTY

GL-16-11-17780

DATE

To legal services rendered and disbursements advanced during the period of June 5, 2017 through June 30, 2017 ; such legal services consisting of the following:

6/05/17 AMB	175.00	.10 L120	A104	Analysis of 6/5/17 correspondence from plaintiff's counsel, copy to me
6/05/17 HCD	130.00	.20 L390		re: party depositions; Telephone call from plaintiff's counsel Samuel Edelman re: scheduling of depositions;
6/05/17 HCD	130.00	, 20 L390		Review of email correspondence from plaintiff's counsel re: scheduling of depositions and discovery responses;
6/06/17 RDL	175.00	.20 L310	A104	Review and analysis of 30 day case status report on interrogatory
6/06/17 AMB	175.00	.70 L310	A104	answers of plaintiff; Analysis of plaintiff's response to Home Depot's first Set of Interrogatories re: analysis of liability allegations, including NY Labor Law violations allegations, ar damages claim for continued defense development and pressing of tender t

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	ice#	564614			j	July 14, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
6/06/17	AMB	175.00	.50	L310	A104	third-party defendant's insurer; Analysis of plaintiff's response to Third-Party Defendant's First Set of Interrogatories re: analysis of liability allegations, including NY Labor Law violations allegations, and
6/06/17	AMB	175.00	.60	L310	A103	damages claim for continued defense development and pressing of tender to third-party defendant's insurer; Drafting additions to 30 Day case Status report Becky Popson re:
						34 34
6/06/17	HCD	130.00	.80	L390		Review and analysis of plaintiff's discovery responses to Home Depot and co-defendant Bryan's Home
6/06/17	HCD	130.00	.70	L390		Improvement; Preparation of 30 day case status report to Becky Popson of Home Depot
6/14/17	AMB	175.00	.10	L330		Analysis of 6/14/17 correspondence from plaintiff's counsel, copy to me re: defendants' deposition status;
6/15/17	AMB	175.00	.10	L330		Analysis of 6/15/17 correspondence from plaintiff's counsel, copy to me
6/15/17	HCD	130.00	. 10	L330		re: party depositions; Review and analysis of email correspondence from plaintiff's counsel re: examination before trial;

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	564614			July 14, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y
6/15/17	MXK	75.00	.10	L330	Attempted to get in contact with our client in order to set up depositions;
6/22/17	AMB	175.00	.10	L330	Analysis of 6/22/17 correspondence from plaintiff's counsel, copy to me re: plaintiff's proposed 7/14/17
6/23/17	AMB	175.00	.10	L330	deposition; Analysis of Jorge Palacios desertion availability re: conducting court-ordered depositions;
6/23/17	MXK	75.00	. 20	L330	
6/24/17	AMB	175.00	.10	L330	Analysis of 6/24/17 correspondence from associate Jorge Palacios re: his appearance as Home Depot's deposition
6/25/17	AMB	175.00	. 10	L330	correspondence from associate Jorge Palacios re: his appearance as Home
6/26/17	AMB	175.00	.10	L320	Depot's deposition witness [SUNDAY]; Analysis of 6/26/17 correspondence from Becky Popson re: status of
6/26/17	JZ	75.00	., 10	L320	Telephone conference with New York State Insurance Fund re: follow-up for plaintiff's lien records;
6/26/17	JZ	75.00	. 10	L320	Letter by fax to New York State Insurance Fund per request by Amelia of Legal Dept. there re: follow-up
6/26/17	JZ	75.00	.10	L320	for plaintiff's lien records;  Telephone conference with MCS Group  Inc. re: follow-up for plaintiff's  records;
6/26/17	JZ	75.00	. 10	L320	·

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	564614	July 14, 2017
DATE ATTY	RATE HOURS TASK ACT	Y
6/26/17 JZ	75.00 .10 L320	plaintiff's large claim file; Telephone conference with Bergenfield Surgical Center re: plaintiff's authorization with additional details
6/26/17 JZ	75.00 .10 L320	for records; Review and analysis of correspondence by email from MCS Group Inc. re: details of plaintiff's records related to accidents in 2013 and 2015;
6/26/17 JZ	75.00 <sub>a</sub> .10 L320	Letter to St. Joseph's Medical Center re: additional details to follow up for plaintiff's large claim file;
6/26/17 JZ	75.00 .10 L320	Review critical points re: continual letter to St. Joseph's Medical Center;
6/26/17 JZ	75.00 .10 L320	Review critical points re: plaintiff's visits and diagnostic at Ironbound MRI, LLC, and outstanding authorization;
6/26/17 JZ	75.00 .10 L320	Draft a plaintiff's authorization to NYS Workers' Compensation Board for execution by plaintiff's legal counsel;
6/26/17 JZ	75.00 .10 L320	Draft a plaintiff's authorization to NYS Workers' Compensation Board for execution by plaintiff's legal counsel;
6/26/17 JZ	75.00 .10 L320	Draft a plaintiff's authorization to New York State Insurance Fund for execution by plaintiff's legal counsel;
6/26/17 JZ	75.00 .10 L320	Draft a plaintiff's authorization to Jose Colon, M.D. for execution by plaintiff's legal counsel;
6/26/17 JZ	75.00 10 L320	Draft a plaintiff's authorization to Ironbound MRI, LLC for execution by plaintiff's legal counsel;

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	ce#	564614			July 14, 2017	
DATE 2	ATTY	RATE	HOURS	TASK	C ACT'Y	
6/26/17	JZ	75.00	.10	L320	Draft a plaintiff's authorization to Bergenfield Surgical Center for execution by plaintiff's legal counsel;	)
6/26/17	JZ	75.00	.30	L320		s
6/28/17	JZ	75.00	.20	L320	· · · · · · · · · · · · · · · · · · ·	
TOTAL FE	ES	· • • • • • • • • • • • • • • • • • • •	. * * * * * *		\$ 922.50	<b>)</b>

DATE RATE		UNITS	TASK	NT EXPENSE NAME
6/06/17 6/06/17 6/06/17 6/13/17	.10 .10 .10	13.00 12.00 6.00	E101 E101 E101 E118	1.30 Duplicating 1.20 Duplicating .60 Duplicating 499.74 Records - Prepayment for Plaintiff's records from the New York State Insurance Fund via The MCS Group, Inc As Per James Zhu - Arturo M. Boutin
6/26/17	.10	4.00	E101	.40 Duplicating
6/26/17	.10	8 . 00	E101	.80 Duplicating
6/26/17	.10	12.00	E101	1.20 Duplicating
6/26/17	.10	12.00	E101	1.20 Duplicating
6/26/17	. 25	4 . 00	E104	1.00 Telecopier -Out, Phone#: (212) 312-7776
6/26/17	. 25	12.00	E104	3.00 Telecopier -Out, Phone#:

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

PAP	TECAT	CEDVICES

Invoice#	564614	Jı	uly 14, 2017
DATE RATE	TINU	S TASK	NT EXPENSE NAME
6/26/17		E105	(212) 267-4262 .24 Long Dist. Tel., Extn (OUTGOING), Phone#: (973) 242-5777
6/26/17		E105	.40 Long Dist. Tel., Extn (OUTGOING), Phone#: (973) 481-4040
6/26/17		E118	497.29 Records - Prepayment for Plaintiff's records from the New York State Insurance Fund via The MCS Group, Inc As Per James
6/27/17	.10	7.00 E101	Zhu - Arturo M. Boutin .70 Duplicating

930 83092

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Atlanta, GA 30339-4024

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

### FOR LEGAL SERVICES

Invoice# 565176

August 9, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP
Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc
Claimant : Daniel Rivera

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

Previous Outstanding Balance \$ .00

Fees for Professional Services Through July 31, 2017 \$ 1,898.00

ATTORNEY	HOURS	RATE	AMOUNT
Arturo Boutin Henry C. Dieudonne Megan Kessig Robert D. Lang James Zhu	1.20 11.10 .90 .80	175.00 130.00 75.00 175.00 75.00	210.00 1,443.00 67.50 140.00 37.50
	14.50		\$ 1,898.00

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

### FOR LEGAL SERVICES

Invoice# 565176

August 9, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc
Claimant : Daniel Rivera

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

To legal services rendered and disbursements advanced during the period of July 5, 2017 through July 31, 2017 ; such legal services consisting of the following:

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
7/05/17	JZ	75.00	.10	L320		Telephone conference with New York State Insurance Fund re: follow-up for lien records;
7/06/17	RDL	175.00	10	L110	A104	Review and analysis of 30 day case status report;
7/06/17	AMB	175.00	. 40	L120		Drafting additions to 30 Day Case

7/06/17 JZ	75.00	.20 L320	A108 Telephone conference with New York Insurance Fund re: additional
7/06/17 HCD	130.00	-20 L330	plaintiff's records request; Telephone conference with plaintiff's counsel Samuel Edelman re: pending examination before trial;
7/06/17 HCD	130.00	1.20 L190	Preparation of 30 day case status

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	565176				August 9, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
						report to Becky Popson of Home Depot
7/07/17	HCD	130.00	2.40	L390		Review and analysis of 210 pages of plaintiff's medical, surgical and radiological records;
7/10/17	HCD	130.00	3.80	L390		Review and analysis of approximately 380 pages of diagnostic, surgical, orthopedic, therapy, and workers' compensation records;
7/11/17	HCD	130.00	.10	L330		Telephone call to plaintiff's counsel Samuel Edelman re: court-ordered depositions;
7/12/17	HCD	130.00	80	L390		Preparation of status report to Home Depot's Becky Popson;
7/13/17	AMB	175.00	,, 20	L330		Analysis of plaintiff's counsel position re: proceeding with 7/14/17 deposition of plaintiff although third-party defendant Bryan's Home Improvement has not provided discovery;
7/13/17	MXK	75.00	.10	L330		Communicated with Plaintiff's counsel in order to try and confirm the deposition on the calendar for tomorrow, I left a message for their calendar clerk;
7/14/17	RDL	175.00	.10	L110	A104	Review and analysis of the 30 day case status report regarding
7/17/17	HCD	130.00	.30	L230		Preparation of correspondence to Hon. Briccetti re: discovery;
7/18/17	JZ	75.00	.20	L320		Telephone conference with plaintiff's counsel re: follow-up for outstanding plaintiff's authorizations;
7/18/17	MXK	75.00	.20	L140		Reviewed the Letter Motion to Judge Briccetti dated July 18, 2017 for e-filing;

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	565176			i	August 9, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
7/18/17	MXK	75.00	.60	L140		E-filed the Letter Motion to Judge Briccetti dated July 18 in the Southern District of New York, per
7/19/17	AMB	175.00	.20	L350		attorney H.D.; Analysis of 7/19/17 Order re: granting Home Depot's request to extend time to complete discovery and setting new 10/2/17 deadline for
7/19/17	AMB	175.00	.30	L350		discovery; Drafting additions to report to Becky Popson re:
7/19/17	HCD	130.00	.30	L230		Preparation of status report to Becky
7/24/17	RDL	175.00	.30	L310	A104	Popson of Home Depot re: Review and analysis of the July 19, 2017, 15 numbered paragraph, Request to Produce, served by plaintiff
7/24/17	RDL	175.00	.30	L310	A104	directed to Home Depot; Review and analysis of the 4 page July 19, 2017 Request to Produced served by plaintiff and directed to third-party defendant Bryan's Home
7/24/17	AMB	175.00	.10	L320		Improvement Corp.; Analysis of 7/24/17 correspondence from Becky Popson,
7/25/17	HCD	130.00	1.10	L190		Review of email correspondence from Becky Popson of Home Depot re:
7/25/17	HCD	130.00	.10	L190		Preparation of email correspondence to Home Depot's Becky Popson re:
7/26/17	UCD	130.00	60	L390	7104	Review and analysis of plaintiff's
						discovery demands;
7/26/17	HCD	130.00	1.20	ь390	A103	Preparation of discovery responses to

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR LEGAL SERVICES

Invoice# 565176

August 9, 2017

DATE ATTYRATE HOURS TASK ACT'Y

> plaintiff's demands following review of discovery, correspondence and pleadings folders;

TOTAL FEES.....

\$ 1,898.00

DATE RATE

UNITS

TASK

NT EXPENSE NAME

7/25/17 .10 10.00 E101

1.00 Duplicating

930 83092

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Atlanta, GA 30339-4024

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 565781

September 11, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP
Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc
Claimant : Daniel Rivera

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

Previous Outstanding Balance

\$ .00

Fees for Professional Services Through August 31, 2017

\$ 2,442.00

### SERVICES SUMMARY

ATTORNEY	HOURS	RATE	AMOUNT
Arturo Boutin Henry C. Dieudonne Megan Kessig Robert D. Lang Helen McDonald James Zhu	4.60 9.40 .70 1.00 .10 2.40	175.00 130.00 75.00 175.00 75.00	805.00 1,222.00 52.50 175.00 7.50 180.00
	18.20		\$ 2,442.00

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 565781

September 11, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

To legal services rendered and disbursements advanced during the period of August 2, 2017 through August 31, 2017 ; such legal services consisting of the following:

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
8/02/17	HCD	130.00	.70	L190		Preparation of 30 day case status report to Becky Popson of Home Depot
8/03/17	AMB	175.00	.30	L120		Drafting additions to 30 Day Case Status report to Becky Popson re:
						in the second se
8/04/17	RDL	175.00	.10	L330	A104	Review and analysis of 30-Day Case Status Report regarding
8/04/17	HCD	130.00	.20	L330		Telephone conference with ноme Depot's witness Jorge Palacios re: deposition preparation;
8/04/17	HCD	130.00	.10	L190		Preparation of email correspondence to Becky Popson of Home Depot re:

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR	T.ECAL.	SERVICES

Invo	ice#	565781			,	September 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
8/07/17	AMB	175.00	.10	L330	A104	Analysis of 8/7/17 correspondence from Becky Popson, copy to me re:
8/07/17	AMB	175.00	.20	L120		Preparation for 7/10/17 case strategy telephone conference with Home Depot
8/07/17	AMB	175.00	.20	L330		Analysis of 8/7/17 correspondence from plaintiff's counsel, copy to me re: plaintiff's 9/8/17 deposition;
8/07/17	HCD	130.00	.10	L390		Receipt and analysis of email correspondence from Becky Popson of Home Depot re:
8/07/17	HCD	130.00	.20	L390		Preparation of email correspondence to Beckv Popson of Home Depot re:
8/08/17	AMB	175.00	.10	L330		Analysis of 8/8/17 correspondence from plaintiff's counsel, copy to me re: proposed 9./8/17 deposition of plaintiff and our assessment of outstanding discovery concerning plaintiff's recent neck surgery to proceed with his deposition;
8/08/17	AMB	175.00	.10	L320		Analysis of 8/8/17 correspondence from plaintiff's counsel, copy to me re: outstanding authorizations for plaintiff's recent neck surgery;
8/08/17	JZ	75.00	.20	L320		Telephone conference with plaintiff's counsel re: follow-up for 9 outstanding authorizations on plaintiff's claim, WC, and updated

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	565781		September 11, 2017
DATE ATTY	RATE HOUR	S TASK ACT'	Y.
8/08/17 HCD	130.00 .2	0 L330	medical records; Telephone conference with plaintiff's counsel's paralegal Anna Santos re:
8/08/17 HCD	130.00 .3	0 L390	pending depositions; Preparation of correspondence to plaintiff's counsel re: outstanding
8/08/17 HCD	130.00 .3	0 L390	discovery; Preparation of correspondence to third-party defendant re: outstanding
8/08/17 MXK	75.00 .1	0 L330	discovery; Added plaintiff's deposition to the calendar tentatively for September
8/09/17 RDL	175.00 .7	0 L120 A109	8th per Plaintiff's counsels e-mail; 9 Prepare for telephone conference with Paul Kaplan and Becky Popson by
8/09/17 AMB	175.00 .2	0 L320	Drafting additions to correspondence to plaintiff's counsel re: request for duly executed authorizations for plaintiff's medical records concerning his recent surgery prior
8/09/17 AMB	175.00 .2	0 L320	to proceeding with plaintiff's deposition; Drafting additions to correspondence to counsel for third-party defendant Bryan's Home Improvement Corp. re: complete copy of its applicable insurance policy to continue pressing
8/09/17 JZ	75.00 .2	0 L320	Home Depot's tender; Telephone conference with plaintiff's counsel re: additional details for requesting outstanding authorizations on plaintiff's surgery and related diagnostic exams, and updated visits
8/09/17 HJM	75.00 .1	0 L140	to healthcare providers; Review and analysis correspondence

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	565781			Ş	September 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
8/09/17	HCD	130.00	.20	L190		from ABI Document Support regarding outstanding invoices; Preparation of email correspondence to Becky of Home Depot re:
8/10/17	RDL	175.00	.20	L120	A106	Telephone conference with Paul Kaplan and Becky Popson regarding current
8/10/17	AMB	175.00	.10	L120		Telephone conference with Paul J. Kaplan, Esq. and Becky Popson re:
8/11/17	AMB	175.00	.30	L320		Drafting additions to response oplaintiff's Request to Produce dated 7/19/17 re: insurance information, witness information, surveillance and photographs of plaintiff and expert information;
8/14/17	AMB	175.00	50	L330		Meeting with Jorge Palacios re: his authorized preparation for appearance as Home Depot's deposition witness;
8/14/17	HCD	130.00	.80	L110		Review of investigations, pleadings, correspondence, in preparation for meeting with Home Depot witness Jorge Palacios;
8/14/17	HCD	130.00	1.40	L110		Meeting with Jorge Palacios of Home Depot in preparation for litigation strategy and depositions;
8/15/17	AMB	175.00	10	L320		Analysis of 8/15/17 correspondence from Becky Popson, copy to me re:
8/15/17	AMB	175.00	.30	L330		/; Drafting additions to report to Becky Popson re:

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	Lce#	565781			S	September 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
8/15/17	HCD	130.00	.10	L390		Receipt and review of email correspondence from Becky Popson of
8/15/17	HCD	130.00	.20	L390		Home Depot re:
8/15/17	HCD	130.00	1.20	L390		Preparation of report to Becky Popson of Home Depot:
8/17/17	AMB	175.00	.10	L130		Analysis of 8/17/17 correspondence from Becky Popson, copy to me re:
8/17/17	HCD	130.00	<sub>*</sub> 10	L190		Review of email correspondence from Becky Popson of Home Depot re:
8/17/17	HCD	130.00	.20	L190		Preparation of email correspondence to Becky Popson of Home Depot re:
8/22/17	HCD	130.00	.80	L390		Receipt and analysis of plaintiff's surgical and post-surgical records from Surgicore of Jersey City and the
8/22/17	HCD	130.00	.20	L190		Back Institute; Telephone conference with investigator Vincent Martinelli re: surveillance of plaintiff;
8/23/17	AMB	175.00	.90	L320		Analysis of 44 pages of medical records on plaintiff from Surgicore
8/23/17	AMB	175.00	.40	L320		of Jersey City re: plaintiff's 7/12/17 cervical fusion surgery for continuing damages exposure assessment; Drafting additions to report to Becky

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	ice#	565781			(	September 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
						Popson re:
8/23/17	JZ	75.00	.10	L320		Review and analysis of plaintiff's authorization to Workers' Compensation Board to ensure the
8/23/17	JZ	75.00	.10	L320		completeness and compliance; Review and analysis of additional plaintiff's authorization to New York State Insurance Fund (for lien records) to ensure the completeness
8/23/17	JZ	75.00	.10	L320		and compliance; Review and analysis of plaintiff's authorization to Ironbound MRI to ensure the completeness and compliance;
8/23/17	JZ	75.00	.10	L320		Review and analysis of plaintiff's authorization to Dr. Paul K. Ratzker to ensure the completeness and compliance;
8/23/17	JZ	75.00	.10	L320		Review and analysis of plaintiff's authorization to Surgicore of Jersey City to ensure the completeness and compliance;
8/23/17	JZ	75.00	.10	L320		Review and analysis of plaintiff's authorization to Dr. Michael Seidenstein to ensure the completeness and compliance;
8/23/17	JZ	75.00	.10	L320		Review and analysis of plaintiff's authorization to Newark Rehab Center to ensure the completeness and
8/23/17	JZ	75.00	.10	L320		compliance; Review and analysis of plaintiff's authorization to NJ Imaging Newark to ensure the completeness and

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	565781			September 11, 2017
DATE	ATTY	RATE	HOURS	TASK	K ACT'Y
8/23/17	JZ	75.00	.10	L320	authorization to Bergenfield Surgical to ensure the completeness and
8/23/17	JZ	75.00	.10	L320	Compensation Board requesting records
8/23/17	JZ	75.00	.10	L320	per plaintiff's authorization; Certified letter to Ironbound MRI, LLC requesting records per plaintiff's authorization;
8/23/17	JZ	75.00	.10	L320	
8/23/17	JZ	75.00	.10	L320	<u>.</u>
8/23/17	JZ	75.00	.10	L320	Certified letter to Newark  Rehabilitation Center requesting  records per plaintiff's
8/23/17	JZ	75.00	.10	L320	<pre>authorization;  Certified letter to Bergenfield Surgical requesting records per plaintiff's authorization;</pre>
8/23/17	JZ	75.00	10	L320	±
8/23/17	JZ	75.00	.10	L320	
8/23/17	JZ	75.00	.10	L320	Letter by fax to Legal Department of New York State Insurance Fund requesting lien records per
8/23/17	HCD	130.00	.60	L390	plaintiff's authorization;  Preparation of
8/24/17	HCD	130.00	.10	L190	Receipt and review of email

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoic	e#	565781			Ç	September 11, 2017
DATE A	TTY	RATE	HOURS	TASK	ACT'Y	
8/24/17 H	CD	130.00	.20	L190	æ	correspondence from Becky Popson of Home Der Preparation of email correspondence to Becky Popson of Home Depot re:
8/25/17 J	Z	75.00	.10	L320		Intake of additional plaintiff's records from New York State Insurance
8/28/17 A	MB	175.00	.10	L320		Fund; Analysis of 8/25/17 correspondence from NY State Insurance Fund re: amount of Worker's Compensation benefits to plaintiff re: assessment of lien for continuing analysis of
8/28/17 A	MB	175.00	.30	L320		claimed damages; Drafting additions to report to Becky Popson re:
						2 & 62
8/28/17 H	ICD	130.00	.30	L190		Preparation of status report to Becky Popson of Home Depot re:
8/28/17 M	IXK	75.00	.20	L330		Communicated with co-detendant's counsel in order to try and schedule our clients deposition, they provided
8/29/17 J	Z	75.00	.10	L320		a few dates that they are available; Telephone conference with MCS Group re: plaintiff's claim records
8/29/17 M	IXK	75.00	.10	L140		request; Called Plaintiff to confirm they would be available on September 25th
8/29/17 M	IXK	75.00	<sub>3</sub> , 10	L330		for our client's deposition, they confirmed that date worked for them; Advised the handling attorneys' via e-mail that both Plaintiff's counsel and co-defendant's counsel are

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	565781			S	September 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
8/29/17	MXK	75.00	.20	:: L330		available on September 25th to take our clients deposition; Communicated with our client in order to confirm that he will be available on the 25th of September for his
8/30/17	AMB	175.00	.10	L330		deposition; Analysis of 8/30/17 correspondence from Jorge Palacios, copy to me re: his 9/25/17 deposition appearance in
8/30/17	HCD	130.00	.80	L390		behalf of Home Depot; Reviewed and analyzed approximately 100 pages of surgical records from Bergenfield Surgical Center;
8/30/17	HCD	130.00	.10	L330		Receipt and review of email correspondence from Home Depot's witness Jorge Palacios re: depositions;
TOTAL FI	EES					\$ 2,442.00

DATE RATE	UNITS	TASK	NT	EXF	ENSE NAME
8/01/17		E102	60	.17	Outside Copy Service - ABI Document Support Services - 05-26-2017 - Specialty Surgeru of Secaucus, LLC, Secaucus, NJ - Flat Service Fee - Shipping and Handling - As Per Helen McDonald - Henry C. Dieudonne, Jr Arturo M. Boutin
8/01/17		E102	52	.00	Outside Copy Service - ABI Document Support Services -

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

LOK DECAT SEKATOR	FOR	LEGAL	SERVICES
-------------------	-----	-------	----------

Invoice#	565781	September	c 11, 2017
DATE RATE	UNITS TAS	K NT	EXPENSE NAME
			05-30-2017 - St. Joseph's Medical Center/Radiology Department, Yonkers, NY - Flat Service Fee - As Per Helen McDonald - Henry C. Dieudonne, Jr Arturo M. Boutin
8/01/17	E10	2 52.	Outside Copy Service - ABI Document Support Services - 05-31-2017 - Bryan Home Improvement Corp., Spring Valley, NY - Flat Fee - As Per Helen McDonald - Henry C. Dieudonne, Jr Arturo M. Boutin
8/01/17	E1(	2 52.	Outside Copy Service - ABI Document Support Services - 05-31-2017 - New York State Insurance Fund - Flat Fee - As Per Helen McDonald - Henry C. Dieudonne, Jr Arturo M. Boutin
8/01/17	E10	2 263.	
8/01/17	E10	2 52.	00 Outside Copy Service - ABI Document Support Services -

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	565781		September 11	, 2017
DATE RATE	UNITS	TASK	NT EXP	ENSE NAME
8/01/17		E102	61.15	05-31-2017 - St. Joseph's Hospital/Billing Department, Yonkers, NY - Flat Service Fee - As Per Helen McDonald - Henry C. Dieudonne, Jr Arturo M. Boutin Outside Copy Service - ABI Document Support Services - 06-07-2017 - St. Joseph's Medical Center/Medical Records Department, Yonkers, NY - Flat Service Fee - Shipping and Handling - Pages - First Set Hard Copies - As Per Helen McDonald - Henry C. Dieudonne, Jr Arturo M. Boutin
8/09/17	.10 8.		.80	Duplicating
8/09/17 8/09/17	.10 3. .10 3.		.30	Duplicating Duplicating
8/15/17	.10 14.		1.40	Duplicating
8/15/17	.10 13.		1.30	Duplicating
8/23/17	.10 36.		3.60	Duplicating
8/23/17	.10 11.	00 E101	1.10	Duplicating
8/23/17	.10 15.		1.50	Duplicating
8/23/17	.25 6.	00 E104	1.50	Telecopier -Out, Phone#: (348) 113-38**
8/23/17	.25 3.	00 E104	.75	Telecopier -Out, Phone#: (212) 312-7776
8/23/17 —		E105	.08	Long Dist. Tel., Extn (OUTGOING), Phone#: (973) 481-1338
8/28/17		E118	3.30	PACER Service Center Invoice #2537476-Q12017 - From 01-01-2017 To

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR	LEGAL	SERVICES
-----	-------	----------

Invoice#	565781	Se	eptember 11, 2017
DATE RATE	UNITS	TASK	NT EXPENSE NAME
8/29/17		E105	03-31-2017 - Court Services .16 Long Dist. Tel., Extn (OUTGOING), Phone#: (201) 374-2829
8/29/17		E118	60.00 Medical Records - Payment for received Plaintiff's records from Bergenfield Surgical Center - As Per James Zhu - Arturo M. Boutin

## Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 71 of 215

930 83092

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Atlanta, GA 30339-4024

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 566415

October 10, 2017

Home Depot GLSL Rtnr/Rivera, Daniel RE:

Litigation No. : GL-16-11-17780

Claim No.

: TBP

Date of Loss : TBP Examiner

: Ms. Becky R. Popson

Defendant : Home Depot U.S.A.Inc Claimant : Daniel Rivera

Our Tax I.D. No. : 13-2916296

Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

Previous Outstanding Balance

\$ .00

Fees for Professional Services Through September 30, 2017 \$ 3,087.00

### SERVICES SUMMARY

ATTORNEY	HOURS	RATE	AMOUNT
Arturo Boutin Henry C. Dieudonne Robert D. Lang Sandy F. Thomas James Zhu	.50 10.90 .60 15.00 4.70	175.00 130.00 175.00 75.00	87.50 1,417.00 105.00 1,125.00 352.50
	31.70		\$ 3,087.00

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

### FOR LEGAL SERVICES

Invoice# 566415

October 10, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP
Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc
Claimant : Daniel Rivera

Claimant : Daniel Rivera

Our Tax I.D. No. : 13-2916296

Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

To legal services rendered and disbursements advanced during the period of September 1, 2017 through September 30, 2017; such legal services consisting of the following:

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
9/01/17	JZ	75.00	.10	L320		Telephone conference with Dr. Paul Ratzker's assistant re: follow-up for plaintiff's records;
9/01/17	JZ	75.00	1, 10	L320		Letter by fax to Back Institute restollow-up for plaintiff's records;
9/01/17	JZ	75.00	.10	L320		Voice message to Bryan Home Improvement Corp. re: follow-up for plaintiff's records;
9/01/17	JZ	75.00	.10	L320		Telephone conference with Ironbound MRI, LLC re: plaintiff's treatment for 2015 accident, and related
9/01/17	JZ	75.00	.10	L320		records request; Letter by fax to Ironbound MRI, LLC per request there re: follow-up for
9/01/17	JZ	75.00	.10	L320		plaintiff's records with additional details; Telephone conference with Dr. Jose Colon's secretary re: follow-up for plaintiff's records;

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	566415		October 10, 2017
DATE ATT	Y RATE F	HOURS TASK A	ACT'Y
9/01/17 JZ	75.00	.10 L320	Letter by fax to Newark Rehabilitation Center per request by records custodian there re: follow-up for plaintiff's records with
9/01/17 JZ	75.00	.20 L320	<pre>additional details; Telephone conference with New York State Insurance Fund re: additional and updated plaintiff's WC and claim records request;</pre>
9/01/17 JZ	75.00	.10 L320	Letter by fax to NJ Imaging Newark re: follow-up for plaintiff's records with additional details;
9/01/17 JZ	75.00	.10 L320	Telephone conference with Dr. Michael Seidenstein's secretary re: follow-up for plaintiff's records;
9/01/17 JZ	75.00	.10 L320	Letter by fax to Surgicore of Jersey City re: follow-up for plaintiff's records;
9/01/17 JZ	75.00	.20 L320	Telephone conference with NYS Workers' Compensation Board re: requesting additional and updated plaintiff's claim records on two accidents;
9/01/17 HCI	130.00	.80 L190	Preparation of 30 day case status report to Becky Popson of Home Depot
9/05/17 RDI	175.00	.20 L230	A104 Review and analysis of 30-Day Case Status Report
9/05/17 JZ	75.00	.10 L320	Telephone conference with Newark Rehabilitation re: details of
9/06/17 AMI	175.00	.10 L330	additional plaintiff's records; Analysis of 9/6/17 notice from plaintiff's counsel re: request for adjournment of 9/25/17 deposition of Home Depot witness Jorge Palacios;

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	566415		October 10, 2017
DATE ATTY	RATE HOURS	TASK ACT'	Y
9/08/17 AMB	175.00 .10	L330	Analysis of 9/8/17 request from counsel for third-party defendant Bryan's Home Improvement re: 9/27/17 deposition of plaintiff and 9/28/17 deposition of Home Depot;
9/08/17 JZ	75.00 .10	L320	Telephone conference with Alexandru Burducea, DO's assistant re: follow-up for plaintiff's records;
9/08/17 JZ	75.00 .10	L320	Telephone conference with Dr. Paul Ratzker's assistant re: follow-up for plaintiff's records;
9/08/17 JZ	75.00 .20	L320	Telephone conference with Dr. Seidenstein's assistant re: plaintiff's surgery in 2016, and related records request;
9/08/17 JZ	75.00 .20	L320	Telephone conference with Dr. Colon's assistant re: plaintiff's surgery in 2015, and related records request;
9/08/17 JZ	75.00 .20	L320	Telephone conference with Ironbound MRI, LLC re: plaintiff's accident 2015, and related records request;
9/08/17 JZ	75.00 .10	L320	Telephone conference with NJ Imaging Newark re: follow-up for plaintiff's records;
9/12/17 AMB	175.00 .10	L320	Analysis of 9/6/17 correspondence from The Back institute re: plaintiff's medical records for continuing damages assessment;
9/12/17 HCD	130.00 .10	L190	Telephone call from investigator Vincent Martinelli of the Pacer Group re: status of surveillance;
9/15/17 AMB	175.00 .10	L330	Analysis of 9/15/17 correspondence from Jorge Palacios, copy to me re: his 9/28/17 deposition (multiple attorneys authorized);
9/15/17 JZ	75.00 .10	L320	Telephone call from Surgicore of Jersey City re: additional details required for plaintiff's records;

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	566415			C	October 10, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
9/19/17		75.00		L320		Telephone conference with Workers' Compensation Board re: follow-up for plaintiff's records;
9/21/17	JZ	75.00	.20	L320		Telephone conference with Dr. Robert White's assistant re: details of plaintiff's diagnostic exams, visits and treatment, and related records
9/21/17	JZ	75.00	. 20	L320		request; Telephone conference with Top Care Physical Therapy & Rehabilitation re: additional details for plaintiff's large medical file;
9/22/17	JZ	75.00	.20	L320		Telephone conference with Jose Colon, MD's assistant re: details of plaintiff's visits since 2015, and related records;
9/22/17	JZ	75.00	.20	L320		Telephone conference with Workers' Compensation Board re: additional details for plaintiff's large claim and WC file;
9/22/17	JZ	75.00	.10	L320		Letter by fax to Back Institute re: follow-up for plaintiff's records;
9/22/17	JZ	75.00	.10	L320		Telephone conference with Ironbound MRI, LLC re: fax for plaintiff's records per request by Deny at the medical office;
9/22/17	JZ	75.00	10	L320		Letter by fax to Ironbound MRI, LLC re: follow-up for plaintiff's records;
9/22/17	JZ	75.00	10	L320		Telephone conference with NJ Imaging Newark at Union re: plaintiff's records at main office in New York;
9/22/17	JZ	75.00	.10	L320		Letter by fax to NJ Imaging Newark in New York re: follow-up for plaintiff's records;
9/22/17	JZ	75.00	.10	L320		Telephone conference with Dr. Michael Seidenstein's assistant re: follow-up for plaintiff's records;

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	566415			(	October 10, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
9/22/17	JZ	75.00	.30	L320		Review critical points re: continual 9/22/17 3 follow-up letters for plaintiff's records;
9/22/17	HCD	130.00	.30	L190		Preparation of status report to Becky Popson of Home Depot re:
9/25/17	JZ	75.00	<sub>s*</sub> 10	L320		Telephone conference with Workers' Compensation Board re: additional details for plaintiff's large WC file to us by email and free of charge;;
9/25/17	JZ	75.00	20	L320		Telephone conference with St.  Joseph's Medical Center re: follow-up for additional plaintiff's records;
9/25/17	SFT	75.00	2.50	L320	A104	Review records from Workers Compensation Board 9/25/15-9/14/17.(1-130 out of 830) for continued case analysis.
9/25/17	SFT	75.00	1.90	L320	A104	Review records from Workers Compensation Board 9/25/15-9/14/17.(130-245 out of 830) for continued case analysis.
9/26/17	RDL	175.00	.20	L230	A104	Review and analysis of court report regarding re-designation of Magistrate Judge Andrew J. Peck to be assigned to the case;
9/26/17	RDL	175.00	.20	L230	A104	Review and analysis of court report regarding assignment to Judge Catherine B. Forrest to the case, with Judge Vincent L. Bericcetti no longer assigned to the suit;
9/26/17	JZ	75.00	.10	L320		Telephone conference with St.  Joseph's Medical Center re: follow-up for plaintiff's radiology records;
9/26/17	SFT	75.00	2.50	L320	A104	Review records from Workers Compensation Board 9/25/15-9/14/17.(245-400 out of 830) for continued case analysis.
9/26/17	SFT	75.00	2.70	L320	A104	Review records from Workers

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR	LEGAL	SERVICES
-----	-------	----------

Invoic	ce#	566415			C	October 10, 2017
DATE A	YTTY	RATE	HOURS	TASK	ACT'Y	
9/27/17 H	HCD	130.00	.20	L330		Compensation Board 9/25/15-9/14/17.(400-550 out of 830) for continued case analysis. Travel to and from plaintiff's
9/27/17 H	łCD	130.00	5.20	L330		counsel's office for deposition of plaintiff; (half time) Conducted liability portion of plaintiff's examination before trial (travel time not included);
9/27/17 H	ICD	130.00	.20	L330		Preparation of email correspondence to Becky Popson of Home Depot re:
9/27/17 5	SFT	75.00	2.70	L320	A104	Review records from Workers Compensation Board 9/25/15-9/14/17.(550-720 out of 830)
9/28/17 F	HCD	130.00	<sub>2</sub> , 20	L330		for continued case analysis.  Travel to and from plaintiff's counsel's office for continued examination before trial of plaintiff; (half time)
9/28/17 F	HCD	130.00	3.20	L330		Conducted examination before trial of plaintiff (travel time not included);
9/28/17 F	HCD	130.00	.20	L190		Preparation of email correspondence to investigator Vincent Martinelli re: surveillance of plaintiff;
9/28/17 F	HCD	130.00	.10	L190		Review of email correspondence from investigator Vincent Martinelli re: surveillance of plaintiff;
9/28/17 H	HCD	130.00	.10	L330		Preparation of email correspondence to Becky Popson of Home Depot re:
9/28/17 \$	SFT	75.00	2.70	L320	A104	Review records from Workers Compensation Board 9/25/15-9/14/17.(720-830 out of 830)
9/29/17 4	AMB	175.00	.10	L330		for continued case analysis. Analysis of 9/29/17 correspondence from Jorge Palacios re: his

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	566415			C	October	10,	2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y			
9/29/17	HCD	130.00	.30	L330		Depot's Prepara post-de	s dep ation epos:	on 10/10/17 as Home position witness; of correspondence with ition demands to at's counsel;
TOTAL F	EES							\$ 3,087.00

DATE RATE	U.	NITS	TASK	NT EXPENSE NAME
9/01/17	. 25	5.00	E104	1.25 Telecopier -Out, Phone#: (688) 818-0***
9/01/17	. 25	5.00	E104	1.25 Telecopier -Out, Phone#: (973) 522-2009
9/01/17	.25	6.00	E104	1.50 Telecopier -Out, Phone#: (734) 811-338*
9/01/17	.25	5.00	E104	1.25 Telecopier -Out, Phone#: (908) 688-1131
9/01/17	. 25	5.00	E104	1.25 Telecopier -Out, Phone#: (201) 795-0737
9/01/17			E118	27.00 Medical Records - Prepayment for Plaintiff's records from Surgicore of Jersey City, LLC - As Per James Zhu - Arturo M.
9/05/17 9/05/17	.10	1.00	E101 E118	Boutin .10 Duplicating 118.50 Medical Records - Prepayment for Plaintiff's records from Newark Rehabilitation Center - As Per James Zhu - Arturo M. Boutin

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice#	566415		October 10,	2017
DATE RATE	UNITS	TASK	NT EXE	PENSE NAME
9/06/17 9/06/17	.10 44	.00 E101 E118	4.40 65.00	
9/14/17 9/22/17 9/22/17 9/22/17 9/22/17 9/22/17	.10 31 .10 40 .10 86 .10 2	.00 E101 .00 E101 .00 E101 .00 E101 .00 E101	.10 3.10 4.00 8.60 .20 1.00	Duplicating Duplicating Duplicating Duplicating Duplicating Duplicating
9/22/17	.25 4	.00 E104	1.00	(868) 881-80** Telecopier -Out, Phone#: (973) 522-2099
9/22/17	.25 5	.00 E104	1.25	· ·
9/22/17	.25 5	.00 E104	1.25	
9/22/17		E105	. 24	
9/22/17		E105	.08	
9/22/17		E105	.32	
9/22/17		E105	.24	
9/25/17	.10 6	.00 E101	.60	
9/25/17		.00 E101	1.70	
9/25/17		E105	.08	(OUTGOING), Phone#: (914) 378-7683
9/26/17		E105	.56	Long Dist. Tel., Extn

9

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	566415	October 10, 2017	
DATE RATE	UNITS	TASK NT EXPENSE NAME	
9/27/17 9/27/17 9/29/17 9/29/17	.10 2.00 .10 1.00 .10 4.00 .10 2.00	(OUTGOING), Phone: 378-7683 E101 .20 Duplicating E101 .10 Duplicating E101 .40 Duplicating E101 .20 Duplicating	‡(: (914)

930 83092

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Atlanta, GA 30339-4024

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 566941

November 8, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc
Claimant

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

Previous Outstanding Balance \$ .00

Fees for Professional Services Through October 31, 2017 \$ 5,396.50

Balance Due \$ .00

## SERVICES SUMMARY

ATTORNEY	HOURS	RATE	AMOUNT
Laurie P. Beatus Arturo Boutin Megan Kessig Robert D. Lang	3.30 9.90 .40 4.30	130.00 175.00 75.00 175.00	429.00 1,732.50 30.00 752.50
Helen McDonald	1.50	75.00	112.50
Jerome Smith	.10	75.00	7.50
Sandy F. Thomas	26.40	75.00	1,980.00
James Zhu	4.70	75.00	352.50
	50.60		\$ 5,396.50

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 566941

November 8, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP
Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

To legal services rendered and disbursements advanced during the period of October 2, 2017 through October 31, 2017; such legal services consisting of the following:

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
10/02/17 10/02/17		130.00 175.00		L190 L230	A104	Draft Notice of appearance; Review and analysis of the Court Order by Judge Katherine B. Forrest making any reference to the Magistrate Judge for general pre-trial proceedings and ordering expert discoveries, dispositive motions and motions in limine prior to the pre-trial conference;
10/02/17	AMB	175.00	.20	L230		Analysis of 10/2/17 Order re: transfer of case to Judge Katherine
10/02/17	MXK	75.00	.10	L140		B. Forrest and discovery deadlines; E-filed a Notice of Appearance with the Southern District of New York for attorney L.B.;
10/04/17	SFT	75.00	2.50	L320	A104	Vetted records from Workers Compensation Board 9/25/15-9/14/17 of plaintiff's medical records for continued case analysis of

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR	TECAL.	SERVICES
rur	LEGAL	DEKATCES

Invo	ice#	566941			1	November 8, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
10/05/17 10/05/17		130.00		L230 L120		plaintiff's injuries (1-100 out 830). Review 30 day report; Drafting additions to 30 Day Case Status report re:
10/05/17	SFT	75.00	2.30	L320	A104	Vetted records from Workers Compensation Board 9/25/15-9/14/17 of plaintiff's medical records for continued case analysis of
10/05/17	SFT	75.00	. 90	L320	A104	plaintiff's injuries (100-180 out 830).  Vetted records from Workers  Compensation Board 9/25/15-9/14/17 of plaintiff's medical records for continued case analysis of plaintiff's injuries (180-220 out
10/06/17	RDL	175.00	.10	L330	A104	830). Review and analysis of 30 day case status report
10/06/17	RDL	175.00	.30	L310	A104	Review and analysis of the october 2, 2017 3-page Supplemental Disclosure by plaintiff pursuant to Rule 26(e)(1) regarding damages;
10/06/17	AMB	175.00	.10	L120		Analysis of 10/6/17 correspondence from Becky Popson, copy to me re:
10/09/17	JZ	75.00	. 20	L320		Telephone conference with Ironbound MRI, LLC re: additional details of plaintiff's diagnostic exams, and

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	566941			:	November 8, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
10/09/17	JZ	75.00	.10	L320		related records request; Telephone conference with Dr. Colon's assistant re: follow-up for
10/09/17	JZ	75.00	.10	L320		plaintiff's medical file; Telephone conference with Back Institute re: follow-up for
10/09/17	JZ	75.00	.10	L320		plaintiff's records; Telephone conference with Dr. Michael Seidenstein's office re: follow-up
10/09/17	JZ	75.00	.20	L320		for plaintiff's records; Telephone conference with St. Joseph's Medical Center, Correspondence re: follow-up for
10/09/17	JZ	75.00	.10	L320		plaintiff's records; Telephone conference with Dr. Michael Seidenstein's assistant re: follow-up
10/09/17	JZ	75.00	.10	L320		for plaintiff's records; Telephone conference with Surgicore of Jersey City re: follow-up for
10/09/17	JZ	75.00	.10	L320		additional plaintiff's records; Telephone conference with Bryan Home Improvement Corp. re: follow-up for
10/09/17	SFT	75.00	2.70	L320	A104	additional plaintiff's records; Vetted records from Workers Compensation Board 9/25/15-9/14/17 of plaintiff's medical records for continued case analysis of plaintiff's injuries (220-340 out 830).
10/09/17	SFT	75.00	2.00	L320	A104	Vetted records from Workers Compensation Board 9/25/15-9/14/17 of plaintiff's medical records for continued case analysis of
						plaintiff's injuries (340-450 out 830).
10/10/17	LPB	130.00	10	L190		Review scheduling order of the Court and new conference date;
10/10/17	RDL	175.00	.20	L230		Review and analysis of October 10,

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	566941			I	November 8, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
						2017 Court Order by Judge Forrest regarding court telephone status conference, now to be held on October 13th with all parties with the October 2, 2017 Court Order;
10/10/17	AMB	175.00	.10	L230		Analysis of 10/10/17 Order re: 10/13/17 telephone Status Conference with Court;
10/10/17	SFT	75.00	2.30	L320	A104	Vetted records from Workers Compensation Board 9/25/15-9/14/17 of plaintiff's medical records for continued case analysis of plaintiff's injuries (450-555 out 830).
10/10/17	SFT	75.00	2.50	L320	A104	Vetted records from Workers Compensation Board 9/25/15-9/14/17 of plaintiff's medical records for continued case analysis of plaintiff's injuries (555-675 out 830).
10/11/17	LPB	130.00	.10	L190		Review scheduling order of the Court and new conference date;
10/11/17	RDL	175.00	.20	L230	A104	Review and analysis of court report regarding letter motion by plaintiff's counsel addressed to Judge Forrest;
10/11/17	AMB	175.00	.70	L120		Analysis of 10/11/17 correspondence
10/11/17	SFT	75.00	2.30	L320	A104	Vetted records from Workers Compensation Board 9/25/15-9/14/17 of
/ /		F5 -00	1 00	1200	7104	plaintiff's medical records for continued case analysis of plaintiff's injuries (675-780 out 830).  Vetted records from Workers
10/11/17	SFT	75.00	1.90	L320	A104	velled records from workers

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	566941			I	November 8, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
						Compensation Board 9/25/15-9/14/17 of plaintiff's medical records for continued case analysis of plaintiff's injuries (780-830 out 830).
10/12/17	LPB	130.00	.30	L330		Review documents from the Back Institute forwarding PL's medical records;
10/12/17	RDL	175.00	, 20	L230	A104	Review and analysis of the October 12, 2017 Order by Judge Forest regarding status conference to be held on October 20, 2017;
10/12/17	SFT	75.00	2.10	L320	A103	Began Draft of medical chronology of medical records from Workers Compensation Board re: insurance information, billing information, medical history, symptoms, complaints, diagnostics testing, procedures, prescriptions, treatment, diagnosis to obtain a clear analysis of plaintiff's injuries.
10/12/17	SFT	75.00	1.90	L320	A103	Continued draft of medical chronology of medical records from Workers Compensation Board re: insurance information, billing information, medical history, symptoms, complaints, diagnostics testing, procedures, prescriptions, treatment, diagnosis to obtain a clear analysis of plaintiff's injuries.
10/13/17	LPB	130.00	.20	L310		Review disclosure of additional records and injuries sustained by PL;
10/13/17	LPB	130.00	.20	L310		Draft email to HD regarding
10/13/17	LPB	130.00	.60	L310		Review the discovery file regarding prior discovery served and answered;
10/13/17	RDL	175.00	.90	L330	A104	Review, for substance and content, the 99 page transcript of the

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	566941			1	November 8, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
10/13/17	RDL	175.00	,70	L330	A104	September 27, 2017 deposition testimony of plaintiff; Review, for substance and content, the 71 page transcript of September 28, 2017 continued deposition
10/16/17 10/16/17		130.00 175.00		L310 L320		testimony of plaintiff; Review discovery disclosure from PC; Analysis of plaintiff's Supplemental FRCP 26(a)(1) exchange re: injuries claimed arising out of 7/12/17
10/16/17	AMB	175.00	.20	L320		cervical fusion surgery; Drafting additions to report to Becky Popson re:
10/16/17	JZ	75.00	10	L320		Telephone conference with Ironbound MRI re: additional plaintiff's
10/16/17	JZ	75.00	.10	L320		records request; Telephone conference with NYO NJIN of Union re: requesting plaintiff's
10/17/17	LPB	130.00	.10	L190		diagnostic exam related records; Review email from HD regarding
10/17/17	LPB	130.00	.10	L190		Draft email to investigator regarding status of surveillance;
10/17/17	LPB	130.00	.10	L190		Review file regarding retaining investigator to perform surveillance;
10/17/17	LPB	130.00	.10	L190		Draft email to HD
10/17/17	AMB	175.00	.10	L130		Analysis of 10/17/17 correspondence from Becky Popson, copy to me re:
10/17/17	AMB	175.00	.10	L130		Drafting additions to report to Becky Popson re:

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	566941			1	November 8, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
10/17/17	JZ	75.00	.10	L320		Letter by fax to One Call Medical re:
10/17/17	JZ	75.00	.20	L320		requesting plaintiff's medical file; Telephone conference with Sharon of One Call Medical re: details for additional authorization for plaintiff's medical file;
10/17/17	JZ	75.00	.10	L320		Review critical points re: continual letter to One Call Medical;
10/18/17	LPB	130.00	.10	L230		Review notice of the telephone conference and background form the Judge;
10/18/17	JZ	75.00	.10	L320		Review and analysis of correspondence from One Call Medical re: details of plaintiff's medical file;
10/18/17	JZ	75.00	.20	L320		Telephone conference with NJ Imaging Newark re: details of plaintiff's records with Iron Mountain, and forwarding our request to IRON Mountain by NJIN;
10/18/17	JZ	75.00	.10	L320		Telephone conference with Iron
						Mountain re: details of plaintiff's records with , and related records request;
10/18/17	JZ	75.00	.10	L320		Telephone conference with Surgicore of Jersey City re: follow-up for plaintiff's records;
10/18/17	JZ	75.00	. 20	L320		Telephone conference with records custodian David of Surgicore of
						Jersey City re: follow-up for plaintiff's records including meds on recent surgery, and arranging charts
10/18/17	JZ	75.00	.20	L320		to us by fax; Telephone conference with Trinitas Hospital re: details plaintiff's recent diagnostic exams, and details in a HIPAA authorization for related

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice	:# 566941		N	Jovember 8, 2017
DATE AT	TY RATE	HOURS TASK	ACT'Y	
10/18/17 JZ	75.00	.10 L320		records; Draft a plaintiff's authorization to Trinitas Hospital for execution by
10/18/17 JZ	75.00	.30 L320		plaintiff's legal counsel; Letter to plaintiff's counsel with supporting documents re: outstanding plaintiff's authorizations request;
10/18/17 JZ	75.00	.30 L320		Letter to plaintiff's counsel with supporting documents re: outstanding plaintiff's authorizations request;
10/19/17 LF	PB 130.00	.30 L190		Telephone call with investigator regarding surveillance of PL;
10/19/17 AM	IB 175.00	.10 L130		Analysis of 10/19/17 correspondence from retained investigator Vincent Martinelli re: status of authorized
10/19/17 JZ	75.00	.20 L320		surveillance on plaintiff; Letter to plaintiff's counsel with re: outstanding plaintiff's authorizations request with related details and supporting documents per
10/20/17 LF	PB 130.00	.10 L330		requirement by plaintiff's counsel; Review letter form PC regarding documents requested post EBT of HD;
10/20/17 RD	DL 175.00	.20 L310	A104	Review and analysis of court order scheduling discovery, dispositive motions, expert discovery and pre-trial materials with a Joint Pretrial Order;
10/20/17 AM	IB 175.00	.50 L230		Preparation for 10/20/17 telephone conference with Court re: review of
				exchanged discovery, expert discovery, post-deposition discovery, third-party defendant's outstanding
10/20/17 AM	18 175.00	.40 L230		discovery and settlement positions; Telephone conference with Court re: discovery status, expert discovery, trial deadline and dispositive motion deadline;

9

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

ROB.	LECAL.	SERVICE

Invoi	ce#	566941			I	November 8, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
10/20/17	AMB	175.00	.20	L340		Analysis of 10/18/17 correspondence from plaintiff's counsel re: economist, occupational medical expert and life care experts being retained by plaintiff;
10/21/17	RDL	175.00	.20	L230	A104	Review and analysis of court order by Judge Forrest assigning Magistrate Judge Peck for settlement discussions;
10/22/17 .	AMB	175.00	1.40	L330		Drafting additions to report to Becky Popson re:
10/22/17	AMB	175.00	.80	L330		Drafting report to Becky Popson re:
10/23/17	LPB	130.00	.10	L190		Review email to client regarding
10/23/17	LPB	130.00	.10	L190		Review email from the investigator forwarding a video of surveillance at PL's residence;
10/23/17	AMB	175.00	.10	L130		Analysis of 10/23/17 correspondence from retained investigator Vincent Martinelli, copy to me re: surveillance footage taken during authorized surveillance activities;
10/23/17	AMB	175.00	.30	L160		Analysis of 10/23/17 correspondence
10/23/17	AMB	175.00	.80	L160		Drafting response 10/23/17 correspondence from Becky Popson re:

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	.ce#	566941			1	November 8, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
						) In the second of the second
10/24/17	RDL	175.00	,20	L310	A104	Neview and analysis of October 19, 2017 correspondence from counsel for plaintiff responding to our demands to obtain records from Trinitas Hospital;
10/24/17	AMB	175.00	.20	L130		Analysis of 10/24/17 correspondence from retained investigator Vincent Martinelli re: authorized surveillance video on plaintiff;
10/24/17	MUH	75.00	.20	L130		Telephone conference with Mr. Thomas Cerchionne of Express Exams, Inc., regarding potential experts to conduct plaintiff's IME;
10/24/17	НЈМ	75.00	.10	L130		Draft correspondence to Mr. Thomas Cerchionne of Express Exams, Inc., regarding potential experts (vocational, neurological and orthopedic) to conduct plaintiff's IME;
10/24/17	НЈМ	75.00	.10	L130		Finalize correspondence to Mr. Thomas Cerchionne of Express Exams, Inc., regarding potential experts (vocational, neurological and orthopedic) to conduct plaintiff's IME;
10/24/17	HJM	75.00	.10	L130		Review and analysis of correspondence from Mr. Thomas Cerchionne of Express Exams, Inc., regarding potential experts to conduct plaintiff's IME;
10/24/17	нЈМ	75.00	.10	L130		Review and analysis of additional correspondence from Mr. Thomas Cerchionne of Express Exams, Inc., regarding recommendations for

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

$r \cap p$	TECAT	SERVICES
I OK	LEGAL	SEKVILES

Invo	ice#	566941				November 8, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
10/24/17	НЈМ	75.00	.20	L130		potential experts to conduct plaintiff's IME; Telephone conference with Mr. Carrie Weiss of Medreview/NPR regarding potential experts to conduct
10/24/17	HJM	75.00	·. 10	L130		plaintiff's IME; Draft correspondence to Mr. Carrie Weiss of Medreview/NPR regarding potential experts to conduct
10/24/17	НЈМ	75.00	.10	L130		plaintiff's IME; Finalize correspondence to Mr. Carrie Weiss of Medreview/NPR regarding potential experts to conduct
10/24/17	НЈМ	75.00	.10	L130		plaintiff's IME; Review and analysis of correspondence from Mr. Carrie Weiss of Medreview/NPR regarding potential
10/24/17	НЈМ	75.00	. 20	L130		experts to conduct plaintiff's IME; Further telephone conference with Mr. David Altman of Medreview/NPR regarding potential experts to
10/25/17	SFT	75.00	1.70	L320	A103	conduct plaintiff's IME; Continued draft of breakdown of records from Workers Compensation Board re: insurance information, decisions, billing information, medical history, symptoms, complaints, diagnostics testing, procedures, prescriptions, treatment, diagnosis to obtain a clear analysis of plaintiff's injuries.
10/25/17	SFT	75.00	1.30	L320	A103	Continued draft of breakdown of records from Workers Compensation
						Board re: insurance information, decisions, billing information, medical history, symptoms, complaints, diagnostics testing, procedures, prescriptions, treatment,

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

	Invo	ice#	566941				November 8, 2017
DA	TE	ATTY	RATE	HOURS	TASK	ACT 'Y	
	6/17 6/17		130.00		L190 L320		diagnosis to obtain a clear analysis of plaintiff's injuries. Review information about the IME; Telephone conference with NJ Imaging Newark re: additional details to follow up plaintiff's medical file including plaintiff's exam in 2017;
10/2	26/17	JZ	75.00	1.10	L320		Telephone conference with Back Institute re: follow-up for
10/2	26/17	JZ	75.00	.10	L320		plaintiff's records; Telephone conference with Dr. Paul Ratzker re: follow-up for plaintiff's
10/2	26/17	JZ	75.00	.20	L320		records; Telephone conference with Workers' Compensation Board re: follow-up for additional plaintiff's claims and WC
10/2	26/17	JZ	75.00	.20	L320		records; Telephone conference with St. Joseph's Medical Center, Radiology re: follow-up for plaintiff's
10/2	26/17	JZ	75.00	.10	L320		records; Telephone conference with Dr. Michael Seidenstein's assistant re: follow-up for plaintiff's records;
10/2	26/17	JZ	75.00	.20	L320		Telephone conference with New York State Insurance Fund re: follow-up for updated plaintiff's claim and lien records;
10/2	26/17	JZ	75.00	.10	L320		Telephone conference with Bryan Home Improvement Corp. re: follow-up for
10/2	26/17	НЈМ	75.00	.10	L130		additional plaintiff's records; Draft correspondence to Mr.David Altman of Medreview/NPR regarding
10/2	26/17	НЈМ	75.00	.10	L130		potential experts to conduct plaintiff's IME; Finalize correspondence to Mr. David Altman of Medreview/NPR regarding potential experts to conduct

November 8, 2017

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

## FOR LEGAL SERVICES

Invoice# 566941

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
10/27/17	JZ	75.00	.10	L320		plaintiff's IME; Telephone conference with Iron Mountain re: details of additional
10/28/17	AMB	175.00	.40	L130		plaintiff's records located; Analysis of 10/28/17 correspondence from retained investigator re: photograph of individual resembling plaintiff for continued damages
10/29/17	AMB	175.00	.10	L130		assessment [SATURDAY]; Drafting correspondence to retained investigator re: request to stop any further surveillance on plaintiff until further surveillance is
10/30/17	RDL	175.00	.20	L310	A104	approved by Home Depot [SUNDAY]; Review and analysis of October 25, 2017 third-party defendant's Second Request for Production of Documents;
10/30/17	RDL	175.00	20	L160	A104	Request for Froduction of Documents;
10/30/17	AMB	175.00	.10	L130		Analysis of 10/30/17 correspondence from retained investigator re: withholding any further surveillance
10/30/17	AMB	175.00	.10	L130		activities on plaintiff; Analysis of 10/30/17 correspondence from Magistrate Peck's law secretary
						re: 10/30/17 telephone conference concerning settlement conference with Magistrate Peck;
10/30/17	AMB	175.00	.10	L130		Telephone conference with plaintiff's counsel re: 10/30/17 correspondence from Magistrate Peck's law secretary concerning 10/30/17 telephone conference on a settlement conference

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	566941			I	November 8, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
10/30/17	AMB	175.00	a 10	L130		with Magistrate Peck; Analysis of 10/30/17 correspondence from third-party defendant Bryan's Home Improvement's counsel re: 10/30/17 correspondence from Magistrate Peck's law secretary concerning 10/30/17 telephone
10/30/17	AMB	175.00	.10	L130		conference on a settlement conference with Magistrate Peck; Telephone conference with opposing counsel and Magistrate Peck's law secretary re: requested settlement
10/30/17	AMB	175.00	.10	L130		conference with Magistrate Peck; Analysis of 10/30/17 correspondence from plaintiff's counsel re: proposed January 2018 settlement conference
10/30/17	AMB	175.00	.10	L130		with Magistrate Peck; Analysis of 10/30/17 correspondence from third-part defendant Bryan's Home Improvement's counsel re: proposed January 2018 settlement
10/30/17	AMB	175.00	.40	L230		conference with Magistrate Peck; Analysis of 10/30/17 Order re: 1/9/18 Settlement Conference with Magistrate Peck and his individual practice rules;
10/30/17	AMB	175.00	.30	L230		Drafting report to Becky Popson re:
10/30/17	AMB	175.00	.10	L230		Analysis of 10/30/17 correspondence from Becky Popson re:
10/30/17	AMB	175.00	.30	L230		Drafting authorized letter to Magistrate Peck re: request for leave to allow Becky Popson to attend

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

TO D	TECAT	SERVICES
rok	LEGAL	SERVICES

Invo	ice#	566941			1	November 8, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
						1/9/18 Settlement Conference by telephone;
10/31/17	LPB	130.00	.10	L330		Review notice of execution of transcript served by Bryan's;
10/31/17	RDL	175.00	.10	L160	A104	Review and analysis of Court Report regarding filed letter request for Becky Popson to appear by telephone at the January 9, 2018 settlement conference;
10/31/17	RDL	175.00	,20	L330	A104	Review and analysis of October 26, 2017 Notice Pursuant to Rule 30 of the Federal Rules of Civil Procedure for plaintiff to execute and return the transcript of the September 28, 2017 deposition, served by third-party defendant;
10/31/17	RDL	175.00	.10	L230	A104	Review and analysis of October 31, 2017 Decision by Magistrate Judge Peck on letter motion for court conference;
10/31/17	AMB	175.00	.30	L230		Drafting report to Becky Popson re:
10/31/17	JXS	75.00	.10	L140		Obtain copy of order dated 10/30/17, docket due date for settlement conference on 1/9/18 @ 2: 00 PM:
10/31/17	MXK	75.00	.30	L140	A110	E-Filed a letter to Judge Andrew J. Peck in the Southern District of New York, dated October 30th;
TOTAL F	EES			enema e .	a a academic	\$ 5,396.50

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	566941			November 8,	2017
DATE RATE		UNITS	TASK	NT EX	KPENSE NAME
10/02/17 10/02/17 10/02/17 10/02/17	.10 .10 .10	4.00 1.00 2.00	E101 E101 E101 E109	.4( .1( .2( 5.5(	Duplicating Duplicating Transportation - 09-27-2017 - Travel to Plaintiff's counsel's office via Subway - Purpose: Plaintiff's EBT - As Per Henry C. Dieudonne, Jr Robert D.
10/02/17			E109	5.50	Lang Transportation - 09-28-2017 - Travel to Plaintiff's counsel's office via Subway - Purpose: Plaintiff's EBT - As Per Henry C. Dieudonne, Jr Robert D. Lang
10/02/17			E118	105.00	2
10/06/17 10/09/17	10	2.00	E101 E115	.20 410.65	Duplicating
10/09/17			E115	276.65	9

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

ROB	T.FCAT.	SERVICES

Inv	oice#	566941			November	8,	2017
DATE	RATE		UNITS	TASK	NT	EXF	PENSE NAME
10/11/1 10/11/1 10/12/1 10/12/1 10/12/1 10/12/1 10/12/1 10/12/1 10/12/1 10/12/1 10/13/1 10/13/1 10/16/1	7 7 7 7 7 7 7 7 7	.10 .10 .10 .10 .10 .10 .10 .10 .10	4.00 2.00 2.00 5.00 73.00 4.00 1.00 1.00 4.00 2.00 1.00	E101 E101 E101 E101 E101 E101 E101 E101	7.	.40 .20 .50 .30 .40 .10 .40 .20 .30 .45	Daniel Rivera - 62 Pages - Appearance Fee - Shared Billing Reduced Rate - File Processing & Conversion - Shipping & Handling - As Per Henry C Dieudonne, Jr Robert D. Lang Duplicating Medical Records - Prepayment for Plaintiff's records from NYO - NJIN of Union via IRM c/o Med Rec Payments - As Per James Zhu - Arturo M. Boutin
10/17/1° 10/17/1° 10/17/1°	7	.10 .10 .25	5.00 7.00 1.00	E101 E101 E104		50 70 25	Duplicating Duplicating Telecopier -Out, Phone#:
10/17/1		.25	1.00	E104		25	(904) 997-3167 Telecopier -Out, Phone#:
10/17/1		.25	1.00	E104		25	(904) 997-3167 Telecopier -Out, Phone#:
10/17/1		. 25	3.00	E104		75	(904) 997-3167 Telecopier -Out, Phone#: (904) 997-3167

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	566941			November 8,	2017
DATE RATE	Ţ	UNITS	TASK	NT EXP	ENSE NAME
10/17/17	. 25	1.00	E104	. 25	Telecopier -Out, Phone#: (904) 997-3167
10/17/17	.25	1.00	E104	. 25	Telecopier -Out, Phone#: (904) 997-3167
10/17/17	.25	1.00	E104	.25	Telecopier -Out, Phone#: (904) 997-3167
10/17/17	.25	1.00	E104	.25	Telecopier -Out, Phone#: (904) 997-3167
10/17/17	.25	1.00	E104	.25	Telecopier -Out, Phone#: (904) 997-3167
10/17/17	.25	1.00	E104	.25	Telecopier -Out, Phone#: (904) 997-3167
10/17/17	.25	1.00	E104	.25	Telecopier -Out, Phone#: (904) 997-3167
10/17/17	.25	1.00	E104	. 25	Telecopier -Out, Phone#: (904) 997-3167
10/17/17	.25	4.00	E104	1.00	Telecopier -Out, Phone#: (904) 997-3167
10/17/17	.25	1.00	E104	.25	Telecopier -Out, Phone#: (904) 997-3167
10/17/17			E105	.08	Long Dist. Tel., Extn (OUTGOING), Phone#: (201) 608-6227
10/17/17			E105	.16	Long Dist. Tel., Extn (OUTGOING), Phone#: (904) 646-0199
10/18/17	.10	18.00	E101	1.80	Duplicating
10/18/17	.10	3.00	E101	.30	Duplicating
10/18/17	.10	3.00	E101	.30	Duplicating
10/18/17	.10	4.00	E101	.40	Duplicating
10/18/17	.10	8.00	E101	.80	Duplicating
10/18/17	.10	4.00	E101	.40	Duplicating
10/18/17	. 25	4.00	E104	1.00	Telecopier -Out, Phone#: (212) 267-4262
10/18/17			E105	.08	Long Dist. Tel., Extn (OUTGOING), Phone#: (201) 816-1724

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	566941		November 8,	2017
DATE RATE	UNITS	TASK	NT EXI	PENSE NAME
10/18/17		E105	.32	Long Dist. Tel., Extn (OUTGOING), Phone#: (201) 608-6227
10/18/17		E105	. 56	
10/18/17		E105	. 24	Long Dist. Tel., Extn (OUTGOING), Phone#: (201) 795-0205
10/23/17	.10 1	0.00 E101	1.00	Duplicating
10/23/17	.10	2.00 E101	.20	Duplicating
10/23/17		1.00 E101	.10	Duplicating
10/23/17		4.00 E101	.40	Duplicating
10/23/17	.10	1.00 E101	.10	Duplicating
10/24/17		E105	.24	Long Dist. Tel., Extn (OUTGOING), Phone#: (516) 288-3100
10/27/17		E105	.48	Long Dist. Tel., Extn (OUTGOING), Phone#: (973) 508-1400
10/27/17		E115	303.00	Transcripts - Diamond Reporting, Inc Date: 10-10-2017 - Deposition of the Defendant, Home Depot USA, by Jorge Palacios - 128 Pages - Copy Order - Delivery and Handling - As Per Laurie Beatus - Arturo M. Boutin - Robert D. Lang
10/30/17		6.00 E101	.60	Duplicating
10/30/17	.10	2.00 E101	.20	Duplicating
10/31/17	1.0	E100 1.00 E101	-1,166.36 .10	100% Expense Discount Duplicating
10/31/17			.10	Duplicating Duplicating
10/31/17		1.00 E101		
10/31/17	.10	3 . 00 E101	.30	Duplicating

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 101 of 215

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR LEGAL SERVICES

Invoice# 566941

November 8, 2017

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 102 of 215

930 83092

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Two World Financial Center Atlanta, GA 30339-4024

D'Amato & Lynch, LLP New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 567219

December 11, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP
Date of Loss : TBP
Examiner : Ms.

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc
Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296 Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

Previous Outstanding Balance

\$ .00

Fees for Professional Services Through November 30, 2017 \$ 3,889.50

## SERVICES SUMMARY

ATTORNEY	HOURS	RATE	AMOUNT
Laurie P. Beatus Arturo Boutin Robert D. Lang Helen McDonald Jerome Smith James Zhu	7.40 1.90 12.30 2.20 .20 3.50	130.00 175.00 175.00 75.00 75.00	962.00 332.50 2,152.50 165.00 15.00 262.50
	27.50		\$ 3,889.50

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 567219

December 11, 2017

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP
Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

To legal services rendered and disbursements advanced during the period of November 1, 2017 through November 30, 2017; such legal services consisting of the following:

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
11/01/17	'AMB	175.00	.10	L230		Analysis of 11/1/17 correspondence from Becky Popson re: Home Depot's
11/01/17	'AMB	175.00	.10	L230		Analysis of 11/1/17 correspondence from Becky Popson re:
11/01/17	7 AMB	175.00	.10	L230		Analysis of 11/1/17 correspondence
11/01/17	7 AMB	175.00	.10	L230		Drafting response to 11/1/17 correspondence from Yvonne Tribble

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	567219	I	December 11, 2017
DATE ATTY	RATE HOURS	TASK ACT'Y	
11/01/17 JXS	75.00 .20	L140	Update attorneys calendar concerning due date for Home Depots' confidential settlement memorandum due on 1/2/18, order dated 10/22/17:
11/02/17 LPB	130.00 .40	L190	Draft report of proceedings going forward and evaluation of the settlement value;
11/02/17 AMB	175.00 .10	L230	Analysis of 11/2/17 correspondence from Becky Popson:
			<b>a</b> ) 3
11/02/17 JZ	75.00 .30	L320	Letter by mail and fax to plaintiff's counsel re: outstanding plaintiff's authorizations request;
11/02/17 JZ	75.00 .20	L320	Letter by mail and fax to Newark Rehabilitation Center re: follow-up plaintiff's records with additional documents;
11/02/17 JZ	75.00 .20	L320	Letter by mail and fax to New York State Insurance Fund, Legal Department re: follow-up for updated plaintiff's claim and lien records;
11/03/17 LPB 11/03/17 RDL		L190 L160 A104	Draft 30 day report;
			)
11/03/17 AMB	175.00 .50	L120	Drafting additions to report re: our

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR	T.ECAT.	SERVICES

Invoice#		567219			Ι	December 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
11/03/17	AMB	175.00	.20	L120		Drafting additions to 30 Day Case Status report to Becky Popson re:
11/03/17	JZ	75.00	.10	L320		Telephone conference with Back Institute re: additional plaintiff's
11/03/17	JZ	75.00	.10	L320		records request; Telephone conference with Ironbound MRI re: additional plaintiff's records request;
11/04/17	AMB	175.00	.40	L130		Analysis of 11/4/17 report from retained investigator re: status of authorized surveillance on plaintiff for continuing damages assessment
11/06/17 11/06/17		130.00 175.00		L190 L120		[SATURDAY]; Review recommended experts; Analysis of 11/6/17 correspondence from Becky Popson, copy to me re:
11/06/17	HJM	75.00	.60	L310		Review and analysis plaintiff's medical records from The Back Institute (approx. 100 pages);
11/06/17	НЈМ	75.00	.50	L310		Review and analysis plaintiff's medical records from Bergenfeld Surgical Center (approx. 80 pages);
11/06/17	HJM	75.00	.20	L310		Review and analysis plaintiff's medical records from St. Joseph's
						Medical Center (14 pages);
11/06/17	HJM	75.00	.20	L310		Review and analysis plaintiff's medical records from Surgicore of Jersey City (20 pages);
11/07/17	LPB	130.00		L190		Review filing of witnesses;
11/07/17	RDL	175.00	.20	L410	A104	Review and analysis of October 30, 2017 correspondence from counsel for

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#		567219			]	December 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
11/07/17	RDL	175.00	1.20	L330	A104	plaintiff regarding 5 witnesses who plaintiff will call at trial in support of plaintiff's claim; Review, for substance and content, the 129-page transcript of the October 10, 2017 deposition testimony of Jorge Palacios;
11/07/17	RDL	175.00	.20	L330	A103	Draft report to Becky Popson regarding
11/08/17	RDL	175.00	.70	L310	A101	Prepare for telephone conference with Home Depot regarding current case status by review of pleadings, surveillance efforts and forthcoming court settlement conference; Labor Law liability claim under Section 240 and agreement for indemnification
11/08/17	RDL	175.00	.20	L120	A106	from Bryan's Home Improvement Corp.; Telephone conference with Paul Kaplan and Becky Popson regarding
11/10/17	AMB	175.00	.10	L210		Analysis of 11/10/17 correspondence from Becky Popson, copy to me re:
11/10/17	AMB	175.00	.10	L210		Analysis of 11/3/17 correspondence from plaintiff's counsel re: request for Home Depot's excess coverage information (multiple attorneys authorized);
11/14/17		75.00 75.00		L130		Review and analysis correspondence from Cary Weiss of Med Review regarding Plaintiff's IMEs; Telephone conference with Cary Weiss of Med Review regarding Plaintiff's

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

## FOR LEGAL SERVICES

Invoice#		567219				December 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
11/14/17	HJM	75.00	.10	L130		IMEs; Review and analysis of further correspondence from Cary Weiss of Med
11/15/17	JZ	75.00	.10	L320		Review regarding Plaintiff's IMEs; Telephone conference with Iron Mountain re: additional plaintiff's records located;
11/15/17	JZ	75.00	, 10	L320		Telephone conference with Dr. Michael Seidenstein's assistant re: follow-up for plaintiff's records;
11/15/17	JZ	75.00	.10	L320		Telephone conference with Newark Rehab Center re: follow-up for additional plaintiff's records;
11/15/17	JZ	75.00	,10	L320		Telephone conference with Dr. Colon re: follow-up for additional plaintiff's records;
11/15/17	JZ	75.00	, 10	L320		Telephone conference with St. Joseph's Medical Center, Correspondence re: follow-up for additional plaintiff's records;
11/15/17	JZ	75.00	.20	L320		Telephone conference with St. Joseph's Medical Center, Radiology
						re: details of plaintiff's diagnostic exams, and related outstanding plaintiff's records request;
11/15/17	JZ	75.00	.10	L320		Telephone conference with St. Joseph Imaging Center re: follow-up for plaintiff's records;
11/15/17	JZ	75.00	.10	L320		Voice message to plaintiff's counsel re: follow-up for outstanding
11/15/17	JZ	75.00	· 30	L320		plaintiff's authorizations; Letter to plaintiff's counsel by fax and mail re: follow-up for
11/15/15	7.07	75.00	10	1220		outstanding plaintiff's authorizations with proof of plaintiff's treatment at related healthcare providers;
11/15/17	UΖ	75.00	. 10	L320		Voice message to NYS Workers'

6

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#		567219				December 11, 2017	
DATE	ATTY	RATE	HOURS	TASK	ACT'Y		
11/15/17	JZ	75.00	.20	L320		Compensation Board re: follow-up for additional plaintiff's claim records; Letter by mail and fax to Back Institute re: follow-up for additional plaintiff's records	
11/15/17	JZ	75.00	.20	L320		related to diagnostic exams; Letter to Bryan Home Improvement Corp. re: follow-up for additional plaintiff's records;	
11/20/17	LPB	130.00	1.60	L210		Continue drafting the 3rd party complaint against ACIC and Bryan's;	
11/20/17	НЈМ	75.00	.20	L310		Telephone conference with Lucy of The Back Institute regarding Plaintiff's incomplete records and request that	
11/21/17	RDL	175.00	.60	L310	A104	new records be sent to our office; Review and analysis of 6-page November 20, 2017 Supplemental Disclosure by plaintiff regarding witnesses, injuries, meds, life care	
11/21/17	RDL	175.00	1.20	L340	A104	plan and economic loss for plaintiff; Review and analysis of the November 17, 2017 expert disclosure by	
11/21/17	RDL	175.00	90	L340	A104	plaintiff of psychologist Dr. Guraci DaSilva; Review and analysis of the November 17, 2017 expert disclosure by plaintiff of Dr. Michael Seidenstein,	
11/21/17	RDL	175.00	1.20	L340	A104	with CV and expert reports; Review and analysis of the November 17, 2017 expert disclosure by	
11/21/17	RDL	175.00	1.30	L340	A104	plaintiff of economist Ronald Missun, with his reports and CV; Review and analysis of the November 17, 2017 expert disclosure by plaintiff of Dr. Harold Bialsky, with his expert report and CV;	
11/21/17	RDL	175.00	1.80	L340	A104	Review and analysis of the November 17, 2017 expert disclosure by	

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	567219			I	December 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
11/21/17	RDL	175.00	1.20	L340	A104	plaintiff of Dr. Omowunmi Osinubi, with his expert report and CV; Review and analysis of the November 17, 2017 expert disclosure by plaintiff of Dr. Paul Ratzker, with
11/21/17	RDL	175.00	1.10	L340	A104	his neurological report and CV; Review and analysis of the November 17, 2017 expert disclosure by plaintiff of Dr. Harvey Rosenblum,
11/21/17	JZ	75.00	.20	L320		with his expert report and CV; Telephone conference with Radiology Image Request of St. Joseph's re: additional details to locate plaintiff's images and related
11/21/17	JZ	75.00	.10	L320		reports; Voice message to Workers' Compensation Board re: follow-up for additional plaintiff's records;
11/21/17	JZ	75.00	.20	L320		Letter to Workers' Compensation Board re: additional details to follow up for additional records per plaintiff's continual claim;
11/21/17	JZ	75.00	.10	L320		Telephone conference with Dr. Seidenstein's assistant re: follow-up for plaintiff's records;
11/21/17	JZ	75.00	.10	L320		Telephone conference with Dr. Colon's office re: follow-up for plaintiff's records;
11/21/17	JZ	75.00	.20	L320		Telephone conference with Bryan Home Improvement Corp. re: follow-up for
11/22/17 11/22/17		130.00 175.00		L310 L330	A104	plaintiff's records; Review supplemental disclosure; Review and analysis of November 17, 2017 correspondence from counsel for plaintiff regarding executed deposition testimony of plaintiff;
11/22/17	RDL	175.00	20	L330	A104	Review and analysis of November 15, 2017 sworn affidavit by plaintiff

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	567219				December 11, 2017
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
11/27/17	LPB	130.00	2.70	L340		regarding his deposition testimony of September 27, 2017; Continue to review the expert disclosures submitted by PC and include in the report;
11/27/17	HJM	75.00	.10	L130		Review and analysis correspondence from Cary Weiss of Med Review
11/28/17	LPB	130.00	1.80	L340		regarding Plaintiff's IMEs; Finalize review of the expert disclosures submitted by PC and include the experts in the draft report;
TOTAL F	EES					\$ 3,889.50

DATE RATE	UNI	TS	TASK	NT EXE	PENSE NAME
11/01/17			E102	.82	Novitex Enterprise Solutions, Inc Date: 08-29-2017 - Service: Ipro Scan - Description: Print from E-Mail - Paralegal: James Zhu
11/02/17	.10	2.00	E101	.20	Duplicating
11/02/17	.10	3.00	E101	.30	Duplicating
11/02/17	.10	4.00	E101	.40	Duplicating
11/02/17	. 25	5.00	E104	1.25	Telecopier -Out, Phone#: (212) 267-4262
11/02/17	.25	5.00	E104	1.25	Telecopier -Out, Phone#: (734) 811-338*
11/02/17	. 25	4.00	E104	1.00	Telecopier -Out, Phone#: (212) 312-7776
11/10/17	.10	2.00	E101	.20	Duplicating

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	567219			December 11	, 2017
DATE I	RATE		UNITS	TASK	NT EX	PENSE NAME
11/10/17		.10	1.00	E101	.10	Duplicating
11/13/17		.10	9.00	E101	.90	Duplicating
11/13/17		.10	14.00	E101	1.40	
11/15/17		.10	2.00	E101	.20	
11/15/17		.10	1.00	E101	.10	± -
11/15/17		.10	2.00	E101	.20	
11/15/17		.10	6.00	E101	.60	
11/15/17		.10	3.00	E101	.30	<u> </u>
11/15/17		.10	3.00	E101	.30	
11/15/17		.10	1.00	E101	.10	
11/15/17		. 25	5.00	E104	1.25	<u> </u>
11/15/17		2.5	2 00	T21 O 4	E 0	(212) 267-4262
TT/T2/T/		.25	2.00	E104	.50	Telecopier -Out, Phone#: (868) 881-80**
11/15/17				E105	.56	
11/13/1/				11177	. 50	(OUTGOING), Phone#: (914)
						378-7000
11/15/17				E105	.08	
						(OUTGOING), Phone#: (845)
						641-4666
11/20/17				E105	.16	
, ,						(OUTGOING), Phone#: (908)
						688-1999
11/21/17		.10	13.00	E101	1.30	Duplicating
11/21/17		.10	18.00	E101	1.80	
11/21/17		.10	147.00	E101	14.70	Duplicating
11/21/17		.10	80.00	E101	8.00	
11/21/17		.10	34.00	E101	3.40	Duplicating
11/21/17		.10	17.00	E101	1.70	Duplicating
11/22/17		.10	8.00	E101	.80	
11/22/17		.10	72.00	E101	7.20	<u> </u>
11/22/17		.10	103.00	E101	10.30	Duplicating
11/30/17				E100	-	

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 112 of 215

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR LEGAL SERVICES

Invoice# 567219

December 11, 2017

TOTAL FEES PLUS EXPENSES.....

## Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 113 of 215

930 83092

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Atlanta, GA 30339-4024

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

### FOR LEGAL SERVICES

Invoice# 567993

January 10, 2018

Home Depot GLSL Rtnr/Rivera, Daniel RE:

Litigation No. : GL-16-11-17780

Claim No. : TBP

Date of Loss : TBP

Examiner : Ms. Becky R. Popson

Defendant : Home Depot U.S.A.Inc

Claimant : Daniel Rivera

Our Tax I.D. No. : 13-2916296 Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

Previous Outstanding Balance

\$ .00

Fees for Professional Services Through December 31, 2017 \$ 7,153.00

## SERVICES SUMMARY

ATTORNEY	HOURS	RATE	TRUOMA
Laurie P. Beatus Arturo Boutin Robert D. Lang Helen McDonald Sandy F. Thomas James Zhu	5.10 21.10 .30 15.20 18.60 2.80	130.00 175.00 175.00 75.00 75.00	663.00 3,692.50 52.50 1,140.00 1,395.00 210.00
	63.10		\$ 7,153.00

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR LEGAL SERVICES

Invoice# 567993

January 10, 2018

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc
Claimant : Daniel Rivera

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

To legal services rendered and disbursements advanced during the period of December 1, 2017 through December 31, 2017; such legal services consisting of the following:

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
12/01/17	НЈМ	75.00	.10	L310		Telephone conference with The Back Institute regarding plaintiff's incomplete records;
12/01/17	НЈМ	75.00	.40	L310		Telephone conference with Michael of NJ Imaging regarding plaintiff's incomplete records;
12/01/17	MUH	75.00	.20	L310		Further telephone conference with NJ Imaging regarding plaintiff's incomplete records;
12/04/17 12/05/17		130.00 175.00		L250 L210		Draft 30 day report; Drafting additions to authorized
						Summons and Complaint re: declaratory action for defense and indemnification against Bryan's Home
12/06/17	RDL	175.00	.10	L330	A104	Improvement Corp. and its insurer Atlantic Casualty Insurance Company; Review and analysis of 30 day case status report regarding depositions plaintiff and Home Depot;

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	567993			Ċ	January 10, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
12/06/17	JZ	75.00	.20	L320		Telephone conference with St. Joseph's Medical Center re: follow-up for plaintiff's records;
12/06/17	JZ	75.00	.10	L320		Telephone conference with Bryan Home Improvement Corp. re: follow-up for plaintiff's records;
12/07/17	LPB	130.00	.10	L210		Finalize the 3rd party complaint with revisions;
12/07/17	RDL	175.00	.20	L330	A104	Review and analysis of December 1, 2017 Notice to Execute served by third-party defendant regarding the testimony of Home Depot Jose Palacios;
12/07/17	JZ	75.00	.10	L320		Telephone conference with Workers' Compensation Board re: requesting updated/additional plaintiff's claim and WC records to us by email;
12/07/17	JZ	75.00	.20	L320		Telephone conference with Trinitas Hospital re: plaintiff's treatment and exams in 2017, and details of related records;
12/07/17	JZ	75.00	.10	L320		Letter by fax to Back Institute re: requesting additional/updated plaintiff's records;
12/07/17	JZ	75.00	.10	L320		Letter to Bryan Home Improvement Corp. re: requesting plaintiff's records;
12/07/17	JZ	75.00	.10	L320		Letter by fax to Newark Rehabilitation re: requesting additional/updated plaintiff's
12/07/17	JZ	75.00	.10	L320		records; Telephone conference with Dr. Seidenstein's assistant re: plaintiff's recent visits, and related records request;
12/07/17	MUH	75.00	.10	L330		Review and analysis of third-party defendant Bryan's Home Improvement Corp.'s Notice to Execute dated

D'Amato & Lynch, LLP Two World Financial Center New York, NY: 10281

Invoice#	567993			January 10, 2018
DATE ATTY	RATE	HOURS	TASK	C ACT'Y
12/07/17 HJM	75.00	n. 30	L310	December 1, 2017 (5 pages); Draft summary of plaintiff's medical records from St. Joseph's Medical Center (9 pages);
12/07/17 HJM	75.00	.20	L310	
12/07/17 HJM	75.00	.50	L310	
12/07/17 HJM	75.00	.20	L310	
12/07/17 HJM	75.00	. 50	L310	
12/07/17 HJM	75.00	.10	L310	
12/07/17 HJM	75.00	.10	L310	
12/07/17 HJM	75.00	.10	L310	
12/07/17 HJM	75.00	.10	L310	
12/07/17 HJM	75.00	.20	L310	O Review and analysis of plaintiff's medical records received from
12/07/17 HJM	75.00	.40	L310	plaintiff's counsel (20 pages);  Draft summary of plaintiff's medical records received from plaintiff's counsel (20 pages);
12/07/17 HJM	75.00	.20	L310	
12/07/17 HJM	75.00	.20	L310	The second secon

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	567993			Č	January 10, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
12/08/17	JZ	75.00	.20	L320		Institute regarding Plaintiff's incomplete records; Telephone conference with Newark Rehabilitation Center re: additional details for plaintiff's records, and
12/08/17	JZ	75.00	.20	L320		arranging charts to us by fax and free of charge; Telephone conference with The Back Institute re: additional details discussion, and arranging plaintiff's large medical file on up to date visit to us by fax;
12/11/17	LPB	130.00	.20	L330		Draft letter to HD witness regarding forwarding the EBT transcript;
12/11/17	LPB	130.00	1.80	L330		Review the EBT transcript of HD and the report on the EBT prior to forwarding the EBT transcript;
12/11/17	LPB	130.00	1.40	L160		Commence drafting mediation statement;
12/11/17	AMB	175.00	.10	L230		Analysis of 12/11/17 correspondence from Yvonne Tribble re: Home Depot's appearance at 1/9/18 Settlement Conference;
12/11/17	AMB	175.00	.10	L230		Drafting response to 12/11/17 correspondence from Yvonne Tribble re: Home Depot's appearance at 1/9/18 Settlement Conference;
12/11/17	AMB	175.00	10	L230		Analysis of further 12/11/17 correspondence from Yvonne Tribble re: Home Depot's appearance at 1/9/18 Settlement Conference;
12/11/17	AMB	175.00	.10	L230		Drafting response to further 12/11/17 correspondence from Yvonne Tribble re: Home Depot's appearance at 1/9/18 Settlement Conference;
12/11/17	НЈМ	75.00	3.90	L310		Review and analysis of plaintiff's Workers' Compensation Records (approx. 1000 pages);

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 118 of 215

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR	LEGAL SE	RVICES			
Invo	ice#	567993	6. 88:		January 10, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y
12/12/17	LPB	130.00	.10	L250	t
12/12/17	AMB	175.00	.10	L230	
					S S
12/12/17	AMB	175.00	10	L230	
/ /					
12/12/17	AMB	175.00	. 10	L230	r
12/12/17	AMB	175.00	.20	L230	
		.1			
12/12/17	JZ	75.00	.10	L320	Telephone conference with plaintiff's counsel re: follow-up for outstanding plaintiff's authorization;
12/12/17	JZ	75.00	.10	L320	

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	567993			,	January 10, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
12/12/17	JZ	75.00	.10	L320		compliance; Letter by certified mail to Trinitas Hospital re: requesting records per plaintiff's authorization;
12/12/17	JZ	75.00	.10	L320		Letter to Bergenfield Surgical Center re: follow-up for plaintiff's records;
12/12/17	JZ	75.00	.10	L320		Telephone conference with St. Joseph's Medical Center, Radiology re: follow-up for plaintiff's records;
12/12/17	SFT	75.00	1.30	L320	A103	Documentation of analysis of Drs. Michael Trepeta, John C. Killian, Michael Katz and Bruce Meinhard's research documents to identify where the physician obtain his education, medical university appointments, research conducted, publication authored, active practice and hospital affiliations prior to obtaining/ conducting background check for
12/13/17	LPB	130.00	.40	L160		Continue drafting mediation statement;
12/13/17	HJM	75.00	3.10	L310		Continued review and analysis of plaintiff's Workers' Compensation Records (approx. 1000 pages);
12/14/17	AMB	175.00	.10	L130		Telephone conference with counsel for third-party defendant Bryan's Home Improvement re: defense IMEs of
12/15/17	LPB	130.00	.80	L160		plaintiff; Review reports on deposition results to finalize the draft of the mediation statement;
12/18/17	AMB	175.00	.90	L340		Analysis of plaintiff's FRCP 26(a)(2)(B) Disclosure of Expert Psychologist Juraci Da Silva, M.A.A, PH.D re: psychological evaluation of

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	567993			į.	January 10, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
12/18/17	AMB	175.00	.80	L340		plaintiff for continued assessment of claimed injuries and case value; Analysis of plaintiff's FRCP 26(a)(2)(B) Disclosure of Expert Orthopedic Surgeon Dr. Michael K. Seidenstein re: orthopedic evaluation and surgical intervention concerning
12/18/17	AMB	175.00	.90	L340		claimed injuries for continued assessment of claimed injuries and case value; Analysis of plaintiff's FRCP 26(a)(2)(B) Disclosure of Expert Neurological Surgeon Dr. Paul K. Ratzker re: orthopedic evaluation and
						surgical intervention concerning claimed injuries for continued assessment of claimed injuries and case value;
12/18/17	AMB	175.00	.50	L340		Analysis of plaintiff's FRCP 26(a)(2)(B) Disclosure of Expert Ophthalmologist Dr. Harvey S. Rosenblum re: orthopedic evaluation and surgical intervention concerning claimed injuries for continued assessment of claimed injuries and case value;
12/18/17	HJM	75.00	1.70	L310		Draft summary of Plaintiff's Workers' Compensation Records (approx. 1000 pages);
12/18/17	НЈМ	75.00	.30	L310		Draft summary of Plaintiff's medical expenses obtained in Plaintiff's Workers' Compensation Records
12/19/17	LPB	130.00	.20	L340		(approx. 1000 pages); Conference with co-def regarding drs
12/19/17	AMB	175.00	.90	L340		for IME; Analysis of plaintiff's FRCP 26(a)(2)(B) Disclosure of Expert Economist Ronald Missun, Ph.D. re:

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	567993	January 10, 2018
DATE ATTY	RATE HOURS TASK	ACT'Y
12/19/17 AMB	175.00 1.60 L340	orthopedic evaluation and surgical intervention concerning claimed injuries for continued assessment of claimed injuries and case value; Analysis of plaintiff's FRCP 26(a)(2)(B) Disclosure of Expert Harold Bialsky, D.C., M.A., C.R.C., C.L.C.P. re: proposed Life Care Plan and Vocational Rehabilitation
12/20/17 AMB	175.00 2.20 L340	Assessment concerning claimed injuries for continued assessment of claimed injuries and case value; Analysis of plaintiff's FRCP 26(a)(2)(B) Disclosure of Preventive Medicine in Occupational and Environmental Medicine Expert Dr. Omowunmi Y.O. Osinubi re: continued assessment of claimed injuries, including residual impairment from a
12/20/17 HJM	75.00 2.10 L310	Plaintiff's Workers' Compensation
12/21/17 AMB	175.00 .10 L130	third-party defendant Bryan's Home Services re: notice that he cannot
12/22/17 AMB	175.00 .20 L230	counsel re: proceeding with 1/9/18 Settlement Conference with Court and
12/22/17 HJM	75.00 .20 L130	agreement to produce plaintiff for neurological and orthopedic IMEs; Telephone conference with JoLynn of Dr. Lecthenberg's office regarding plaintiff's IME;
12/26/17 AMB	175.00 5.70 L340	

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

TOT:	T.ECAT.	SERVICES

Invo	ice#	567993			Č	January 10, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
						э
12/26/17	JZ	75.00	.10	L320		
12/26/17	SFT	75.00	2.80	L320	A104	Review of plaintiff's medical records from Newark Rehabilitation Center (4pgs) and Black Institute (163pgs) for continued analysis of plaintiff
12/26/17	SFT	75.00	3.00	L320	A104	alleged injuries. Review additional medical records from Newark Rehabilitation Center (315 pgs) for continued analysis of
12/27/17	AMB	175.00	2.60	L160		plaintiff's alleged injuries. Drafting additions to Home Depot's Confidential Settlement Memorandum re: liability and damages position at 1/9/18 Settlement Conference;
12/27/17	AMB	175.00	.10	L130		Telephone conference with Michael DeCarlo, Esq., counsel for third-party defendant Bryan's Home Improvement re: status of plaintiff's
12/27/17	AMB	175.00	.10	L130		IMEs; Telephone call to Michael DeCarlo, Esq., counsel for third-party defendant Bryan's Home Improvement re: status of his authority to share in plaintiff's IME costs;
12/27/17	AMB	175.00	.30	L130		THE CODES,
12/27/17	AMB	175.00	.10	L130		

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	567993			Ċ	January 10, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
12/27/17	JZ	75.00	.10	L320		Telephone conference with Bryan Home Improvement Corp. re: follow-up for plaintiff's records;
12/27/17	JZ	75.00	.10	L320		Telephone conference with Trinitas Hospital, Correspondence re: follow-up for plaintiff's records;
12/27/17	JZ	75.00	.10	L320		Telephone conference with Trinitas Hospital, Radiology re: follow-up for plaintiff's records;
12/27/17	JZ	75.00	.10	L320		Letter to Trinitas Hospital required by Radiology Department there re: plaintiff's radiology records
12/27/17	JZ	75.00	.20	L320		request; Telephone conference with St. Joseph's Medical Center re: follow-up for plaintiff's records;
12/27/17	JZ	75.00	.10	L320		Review critical points re: continual letter to Trinitas Hospital, Radiology Department;
12/27/17	JZ	75.00	,10	L320		Intake additional plaintiff's records from Bergenfield Surgical Center;
12/27/17	SFT	75.00	.20	L320	A108	Telephone conference with Dr. Lechtenberg's office re: date and time for plaintiff's independent medical examination.
12/27/17	SFT	75.00	.30	L320	A103	Draft correspondence letter re:notice of plaintiff's independent medical examination of 1/3/18.
12/27/17	SFT	75.00	2.50	L320	A104	Review medical record from the New York State Insurance Fund (1-213pgs
12/27/17	SFT	75.00		L320	A104	out of 581pgs) for continued analysis of plaintiff's alleged injuries. Review medical record from the New York State Insurance Fund (214-430 pgs out of 581pgs) for continued analysis of plaintiff's alleged injuries.
12/28/17	AMB	175.00	1.10	L160		Drafting further additions to Home

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 124 of 215

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR	LEGAL SI	ERVICES				*
Invo	ice#	567993	*			January 10, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT	Y
12/28/17	AMB	175.00	.10	L160		Depot's Confidential Settlement Memorandum re: liability and damages position at 1/9/18 Settlement Conference;
12/28/17	AMB	175.00	.10	L130		
12/28/17	AMB	175.00	.10	L160		
12/28/17	AMB	175.00	.40	L160		
	Invo. DATE 12/28/17 12/28/17	Invoice# DATE ATTY  12/28/17 AMB  12/28/17 AMB  12/28/17 AMB	DATE ATTY RATE  12/28/17 AMB 175.00  12/28/17 AMB 175.00  12/28/17 AMB 175.00	Invoice# 567993 .  DATE ATTY RATE HOURS  12/28/17 AMB 175.00 .10  12/28/17 AMB 175.00 .10  12/28/17 AMB 175.00 .10	Invoice# 567993  DATE ATTY RATE HOURS TASK  12/28/17 AMB 175.00 .10 L160  12/28/17 AMB 175.00 .10 L130  12/28/17 AMB 175.00 .10 L160	Invoice# 567993 .  DATE ATTY RATE HOURS TASK ACT'  12/28/17 AMB 175.00 .10 L160  12/28/17 AMB 175.00 .10 L130  12/28/17 AMB 175.00 .10 L160

12/28/17 AMB 175.00 .10 L160

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoid	ce#	567993	761		j	January	10,	2018
DATE A	ATTY	RATE	HOURS	TASK	ACT'Y			
12/28/17	AMB	175.00	.30	L160				
12/28/17 2	AMB	175.00	.10	L160				
					•			
12/28/17 5	SFT	75.00	.10	L320	A104			ail correspondence from s counsel re: receipt of
		- 				notice indepen	rega ident	arding plaintiff's upcoming medical examination with Dr. Lechtenberg.
12/28/17	SFT	75.00	.10	L320	A108	Telepho Service plainti medical	ne c re: ff's exa	conference with Magna Legal Spanish interpreter for supcoming independent amination with Dr.
12/28/17	SFT	75.00	2.50	L320	A104	Review York St pgs) fo	medi ate or co	g on 1/3/18.  cal record from the New Insurance Fund (430-581 ontinued analysis of alleged injuries.
12/28/17	SFT	75.00	.10	L320	A104	Review Magna L of sche	e-ma egal duli	s alleged injuries.  ail correspondence from  Service re: confirmation  ng Spanish interpreter for  s upcoming independent
12/28/17 :	SFT	75.00	2.90	L320	A104	medical Lechten Review Bergenf and pla	exa berg medi ielo inti	nmination with Dr.  Jon 1/3/18.  Cal records from  Surgical Center (51pgs)  Eff's document production  Compile for plaintiff's

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR LEGAL SERVICES

Invoice# 567993

January 10, 2018

DATE ATTY RATE HOURS TASK ACT'Y

upcoming independent medical examination.

TOTAL FEES.....

\$ 7,153.00

nt

\$

DATE	RATE	UNIT	S	TASK	NT EX	PENSE NAME
12/01/1	7			E105	.08	Long Dist. Tel., Extn (OUTGOING), Phone#: (908) 688-1999
12/01/1	7			E105	.32	Long Dist. Tel., Extn (OUTGOING), Phone#: (201) 567-8275
12/01/1	7			E120	1,509.96	Private Investigation(s) - Pacer Group Inc Period: From 08-19-2017 To 10-28-2017 - Various Investigative Services - As Per Laurie Beatus - Arturo M. Boutin - Robert D. Lang
12/01/1	7			E118	444.00	Translation Services - Eiber Translations, Inc Job Date: 09-27-2017 - Language: Spanish - Witness: Daniel Rivera - As
12/01/1	7			E118	222.00	Per Robert D. Lang Translation Services - Eiber Translations, Inc Job Date: 09-28-2017 - Language: Spanish - Witness: Daniel Rivera - As Per Robert D. Lang
12/07/1	7 .1	0	2.00	E101	.20	

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoic	e# 567993			January	10,	2018
DATE RA	TE	UNITS	TASK	NT	EXP	ENSE NAME
12/07/17	.10	2.00	E101		.20	Duplicating
12/07/17	.10	1.00	E101		.10	Duplicating
12/07/17	.10	3.00	E101		.30	Duplicating
12/07/17	10	581.00	E101	58	3.10	Duplicating - MCDONALD HELEN
10/05/15	1.0	2 00	E101		.20	Duplicating
12/07/17	.10	2.00 2.00	E101		.20	Duplicating Duplicating
12/07/17	.10		E101	2	2.30	Duplicating
12/07/17	.10	23.00	E101	2	.40	Duplicating
12/07/17	.10	4.00	E101	1	1.00	Telecopier -Out, Phone#:
12/07/17	.25	4.00	EIU4			(086) 888-180*
12/07/17	.25	4.00	E104	1	1.00	Telecopier -Out, Phone#: (348) 113-38**
12/07/17			E105		.16	Long Dist. Tel., Extn (OUTGOING), Phone#: (607) 337-7475
12/07/17			E105		.08	Long Dist. Tel., Extn (OUTGOING), Phone#: (607)
12/07/17			E105		.08	Long Dist. Tel., Extn (OUTGOING), Phone#: (914) 557-0343
12/07/17			E105		.08	Long Dist. Tel., Extn (OUTGOING), Phone#: (845) 641-4666
12/07/17			E105		. 24	Long Dist. Tel., Extn (OUTGOING), Phone#: (908) 688-1999
12/08/17	.10	5.00	E101		.50	Duplicating
12/08/17	.10	3.00	E101		.30	Duplicating
12/08/17	.10	56.00	E101	5	5.60	Duplicating
12/08/17	.10	31.00	E101	3	3,10	Duplicating
12/08/17	.10	14.00	E101	1	L.40	Duplicating
12/08/17	.10	81.00	E101	8	3.10	Duplicating
12/11/17	.10	830.00	E101	83	3 . 00	Duplicating - MCDONALD HELEN
12/11/17	.10	3.00	E101		30	Duplicating

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	567993		January 10, 2018
DATE RATE	UNITS	TASK	NT EXPENSE NAME
12/11/17 12/12/17	.10 3.00 .25 4.00	E101 E104	.30 Duplicating 1.00 Telecopier -Out, Phone#:
12/12/1/	.25 4.00	ET04	(201) 374-2835
12/14/17	.10 1.00	E101	.10 Duplicating
12/14/17	.10 1.00	E101	.10 Duplicating
12/26/17	.10 10.00		1.00 Duplicating -
12/27/17	.10 50.00		5.00 Duplicating - ZHU JAMES
12/27/17	.10 11.00		1.10 Duplicating
12/27/17	.10 13.00		1.30 Duplicating
12/27/17	.10 2.00		.20 Duplicating
12/27/17	.10 51.00		5.10 Duplicating
12/27/17	.10 3.00	E101	.30 Duplicating
12/27/17	.10 6.00		.60 Duplicating
12/27/17	.10 2.00		.20 Duplicating
12/27/17	.10 2,00	E101	.20 Duplicating
12/27/17	.25 3.00	E104	.75 Telecopier -Out, Phone#: (212) 267-4262
12/27/17		E105	.08 Long Dist. Tel., Extn (OUTGOING), Phone#: (845) 641-4666
12/27/17		E105	.32 Long Dist. Tel., Extn (OUTGOING), Phone#: (908) 994-5000

## Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 129 of 215

930 83092

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Atlanta, GA 30339-4024

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

### FOR LEGAL SERVICES

Invoice# 568682

February 12, 2018

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP
Date of Loss : TBP

Examiner : Ms. Becky R. Popson Defendant : Home Depot U.S.A.Inc

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

Previous Outstanding Balance

\$ .00

Fees for Professional Services Through January 31, 2018 \$ 6,695.50

## SERVICES SUMMARY

ATTORNEY	HOURS	RATE	TNUOMA
Laurie P. Beatus Arturo Boutin Megan Kessig   Robert D. Lang Helen McDonald Jerome Smith Sandy F. Thomas James Zhu	13.10 15.60 1.50 4.70 2.80 1.60 10.70 2.60	130.00 175.00 75.00 175.00 75.00 75.00 75.00	1,703.00 2,730.00 112.50 822.50 210.00 120.00 802.50 195.00
	52.60		\$ 6,695.50

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

### FOR LEGAL SERVICES

Invoice# 568682

February 12, 2018

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP
Date of Loss : TBP

Examiner : Ms. Becky R. Popson Defendant : Home Depot U.S.A.Inc

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

To legal services rendered and disbursements advanced during the period of January 2, 2018 through January 31, 2018 ; such legal services consisting of the following:

DATE	YTTA	RATE	HOURS	TASK	ACT'Y	
1/02/18 1/02/18		130.00 175.00	.10	L160 L330	A104	Review finalized mediation statement; Review and analysis of December 22, 2017 correspondence from counsel for plaintiff regarding deposition testimony of Home Depot witness Jorge Palacios;
1/02/18	RDL	175.00	.20	L160	A103	Finalize and send letter to Magistrate Judge Peck regarding requested appearance by Mary Loudermilk by telephone for the January 9th settlement conference;
1/02/18	RDL	175.00	.20	L160	A103	Draft report to the client regarding our position on mediation and request that Mary Loudermilk appear by telephone at the forthcoming settlement conference;
1/02/18	RDL	175.00	.30	L160	A103	

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	568682				February 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
1/02/18	AMB	175.00	.20	L230		Drafting correspondence to Magistrate Peck re: request for leave to have Mary Loudermilk appear at 1/9/18 Settlement Conference by telephone;
1/02/18	JXS	75.00	.40	L140		Review Judge Peck's and United State Southern District, and e-filing Rules to comply before e-filing letter dated 1/2/18:
1/02/18	JXS	75.00	.10	L140		E-filed letter dated 1/2/18, request leave to attend January 9, settlement conference:
1/02/18	MXK	75.00	.20	L140		Called Plaintiff's counsel to let them know that the Doctor scheduled for the IME of their client had to cancel due to the flu, I asked them to provide other available dates;
1/03/18	LPB	130.00	.20	L340		Telephone call from Dr's office regarding rescheduling of IME because of Dr's illness;
1/03/18	LPB	130.00	10	L160		Draft email to HD regarding the Court allowing HD to appear by telephone at the court conference;
1/03/18	RDL	175.00	.20	L160		Review and analysis of the Court Order allowing Mary Loudermilk to appear by telephone at the forthcoming settlement conference;
1/03/18	SFT	75.00	.20	L320		Telephone conference with Dr. Lechtenberg's office re: new date for plaintiff's independent medical examination.
1/03/18	SFT	75.00	.20	L320	A108	Telephone conference with plaintiff's counsel re:new date for plaintiff's independent medical examination.
1/04/18	AMB	175.00	.10	L230		

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	568682			I	February 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
1/05/18	LPB	130.00	.20	L340		Telephone call from Dr's office regarding rescheduling of IME;
1/05/18	RDL	175.00	.10	L160	A104	Review and analysis of January 5th 30-Day Case Status Report regarding medical records, depositions, and forthcoming settlement conference;
1/05/18	SFT	75.00	.20	L320	A108	
1/05/18	SFT	75.00	.30	L320	A103	Draft correspondence letter to plaintiff's counsel re: plaintiff's
1/08/18	LPB	130.00	1.40	L160		new independent medical examination. Review letter to court and prepare documents to provide to the Judge in preparation of the settlement conference;
1/08/18	LPB	130.00	.80	L240		Review MSJ filed by PC plus a memo of law;
1/08/18	LPB	130.00	.20	L210		Draft email to HD regarding seeking approval of the DJ complaint;
1/08/18	LPB	130.00	.20	L210		Finalize the draft of the complaint against ACIC;
1/08/18	AMB	175.00	.10	L320		adding Hole,
1/09/18	LPB	130.00	.70	L160		Commence drafting report on the settlement conference;
1/09/18	LPB	130.00	.10	L160		Review order of referral to a court mediator;
1/09/18	RDL	175.00	.20	L160	A104	Review and analysis of the January 9th Court Report by Magistrate Judge Peck referring the case to the Court Mediation Program;
1/09/18	AMB	175.00	1.00	L230		Travel to and from USDC Courthouse, SDNY re: court-ordered settlement conference; (half time)

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	568682	865		F	Pebruary 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	8
1/09/18	AMB	175.00	1.80	L230		Appearance in SDNY re: court-ordered settlement conference;
1/09/18	AMB	175.00	.10	L340		A content content of
1/09/18	AMB	175.00	.10	L210		
1/09/18	AMB	175.00	.20	L320		
1/09/18	AMB	175.00	.10	L160		
1/09/18	AMB	175.00	, 10	L160		Analysis of 1/9/18 correspondence from NAM re: request for Home Depot's position to mediate case with
1/09/18	AMB	175.00	a. 10	L160		mediator Judge John DiBlasi;
1/09/18	AMB	175.00	.10	L160		0
1/09/18	JZ	75.00	a. 10	L320		Review and analysis of plaintiff's authorization to Rosenblum Eye Center to ensure the completeness and
1/09/18	JZ	75.00	.10	L320		compliance; Review and analysis of plaintiff's

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	568682			F	February	12,	2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y			
1/09/18	JZ	75.00	.10	L320		Seidenst complete Review a authoriz to ensur	tein eness ind a zation	on to Dr. Michael to ensure the s and compliance; analysis of plaintiff's on to Dr. Juraci Da Silva he completeness and
1/09/18	JZ	75.00	.10	L320		authoriz	and a zation	analysis of plaintiff's on to Dr. Paul Ratzker to completeness and
1/09/18	JZ	75.00	.10	L320		Letter b Eye Cent	y cer	ertified mail to Rosenblum re: requesting records per authorization;
1/09/18	JZ	75.00	.10	L320		Letter b Michael	y co Seio per	ertified mail to Dr. denstein re: requesting plaintiff's
1/09/18	JZ	75.00	.10	L320		Letter b Juraci D	oy ce Da Si per	ertified mail to Dr. ilva re: requesting plaintiff's
1/09/18	JZ	75.00	.10	L320		Letter b Ratzker	y ce:	ertified mail to Dr. Paul requesting records per authorization;
1/09/18	JZ	75.00	.20	L320		Telephon Reginal details both Cor	ne co Med: for resp	onference with Trinitas ical Center re: additional plaintiff's records from pondence and Radiology;
1/09/18	JXS	75.00	.40	L140		Review of copy of summary	cour req jud	t docket sheet to obtain uested document, plaintiff gment motion, and documents:
1/10/18	LPB	130.00	2.00	L160		Commence liabilit settleme	e dra y, c ent	afting a report on the damages and the future issues;
1/10/18	AMB	175.00	. 10	L160		Analysis	of	1/9/18 Order re: referral mediation;

February 12, 2018

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

### FOR LEGAL SERVICES

568682

Invoice#

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
1/10/18	AMB	175.00	1.60	L230		
1/10/18	JZ	75.00	.20	L320		Telephone conference with Trinitas Reginal Medical Center, Radiology re: additional details for plaintiff's radiology records including
1/11/18	LPB	130.00	.60	L160		plaintiff's chest x-rays; Continue drafting the report on the liability and future settlement
1/11/18	JXS	75.00	.30	L140		issues; Update attorneys calendar concerning due date to notify Mediator regarding disqualification on 1/26/18, due date for Federal Court to assigned Mediation on 1/19/18 and Mediator Expert Request on 1/16/18, per order
1/11/18	HJM	75.00	.10	L240		dated 1/9/18; Review and analysis of Plaintiff's Partial Summary Judgment Motion, Declaration in Support of Plaintiff's Motion for Summary Judgment, Memorandum of Law in Support of Plaintiff's Motion for Summary Judgment dated January 5, 2018
1/12/18	LPB	130.00	1.70	L190		(approx. 1,000 pages); Conduct a verdict search for the report on the liability and future
1/12/18	RDL	175.00	.10	L160	A104	settlement issues; Review and analysis of Court-filed Notice of Assignment of Mediator;
1/16/18	LPB	130.00	.20	L340		Telephone conference with Dr's office

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	568682			1	February 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
1/16/18	SFT	75.00	.20	L320	A108	regarding IME to be conducted 1/17; Telephone conference with Dr. Lechtenberg's office re: confirming with plaintiff's independent medical examination.
1/16/18	SFT	75.00	.20	L320	A108	_
1/16/18	SFT	75.00	.20	L320	A108	±
1/16/18	MXK	75.00	.20	L140		Called PC to confirm they are prepared for tomorrow's IME;
1/17/18	RDL	175.00	.10	L160	A104	Review and analysis of the January 17th correspondence from NAM regarding potential mediators, dates and times for settlement conference;
1/17/18	AMB	175.00	.10	L160		Analysis of 1/17/17 correspondence from NAM re: proposed mediation dates and mediators;
1/17/18	AMB	175.00	.10	L160		Analysis of 1/17/17 correspondence from counsel for third-party defendant Bryan's re: agreement to mediation at JAMS on 2/7/18 with mediator Judge John DiBlasi;
1/17/18	AMB	175.00	.10	L160		Analysis of 1/17/17 correspondence from plaintiff's counsel re: proposed mediation at JAMS on 2/7/18 with mediator Judge John DiBlasi;
1/17/18	AMB	175.00	.10	L160		Analysis of further 1/17/17 correspondence from plaintiff's counsel re: proposed mediation at JAMS on 2/7/18 with mediator Judge John DiBlasi;
1/17/18	JXS	75.00	.20	L140		Review USDC_SDNY Local rule 6.1 to compute due date to oppose plaintiff's summary judgment motion

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	568682	94		I	February 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
1/17/18	SFT	75.00	3.10	L320	A104	dated 1/8/18: Vetted/review of workers' compensation board and Insurance Fund records (581pgs) to cross reference to identify any duplications before providing to expert witness Dr. Lechtenberg for his review (876pgs) for contained analysis of plaintiff's injuries.
1/17/18	MXK	75.00	.10	L140		Sent Magna a copy of the Notice to take Plaintiff's IME, per their request;
1/18/18	JZ	75.00	.20	L320		Telephone conference with Joseph of Dr. Juraci Da Silva's office re: additional details for plaintiff's records for his psychological consultation;
1/19/18	LPB	130.00	.20	L240		Draft letter to the court regarding extension of time to answer the complaint;
1/19/18	AMB	175.00	2.60	L160		e
						C C
1/19/18	MXK	75.00	.10	L140		E-filed a letter motion with the Southern District of New York, per attorney L.P.B.;
1/21/18	AMB	175.00	» <u>*</u> 10	L160		Analysis of 1/21/18 correspondence from counsel for third-party defendant Bryan's re: agreement to mediate case on 2/7/18 at NAMS [SUNDAY];
1/22/18 1/22/18		130.00 175.00		L190 L240	A104	Finalize analysis of case; Review and analysis of the January 22, 2018 court order re-setting

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	ice#	568682	90"		E	February 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
1/22/18	RDL	175.00	.10	L240	A104	deadlines with responses due February 12, 2018 to motion for summary judgment; Review and analysis of so-ordered agreed upon extension of time to oppose motion for summary judgment
1/22/18	RDL	175.00	.10	L240	A104	issued by Judge Forrest; Review and analysis of court report regarding letter motion for extension
1/22/18	RDL	175.00	.20	L240	A104	of time to file opposition to motion for summary judgment, served by counsel for plaintiff; Review and analysis of the January 22, 2018 court report regarding order issued by the Magistrate Judge on whether plaintiff has a position on the application on the extension of
1/22/18	RDL	175.00	.30	L430	A104	time to oppose the motion for summary judgment; Review and analysis of the January 24, 2018 correspondence from Paul Kaplan regarding application of Labor Law Section 240 and basis for \$6 to \$7 million potential jury verdict
1/22/18	RDL	175.00	.30	L430	A10:	range.
1/22/18	JXS	75.00	.10	L140		Communicated with Judge Forrest's part regarding letter motion to extend time to answer:
1/22/18	JXS	75.00	.10	L140		Obtain copy of letter dated 1/19/18, request for time to file answer, signed order from Judge Forrest, Southern District New York:

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	568682			F	February 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
1/22/18	SFT	75.00	.50	L320	A104	Vetted/review plaintiff's counsel interrogatories dd. 5/23/17, supplement disclosure dd. 10/2/17 and supplement disclosure dd. 11/20/17 to provide Dr. Lechtenberg for his review and analysis of plaintiff's injuries.
1/22/18	SFT	75.00	2.70	L320	A104	Vetted/review plaintiff medical records and films from New Jersey Imaging Network, Bergenfield Surgical Center, Newark, Rehabilitation Center, Back Institute, New York State Workers Compensation Board/New York Insurance Fund to provide Dr. Lechtenberg for his review and analysis of plaintiff's injuries.
1/22/18	SFT	75.00	40	L320	A103	Draft correspondence letter to Dr. Lechtenberg re: plaintiff's interrogatories, supplemental disclosures, medical records and films to provide Dr. Lechtenberg for his review and analysis of plaintiff's injuries.
1/22/18	SFT	75.00	1.50	L320	A104	Vetted/review of workers' compensation board and Insurance Fund records (581pgs) to cross reference to identify any duplications before providing to expert witness Dr. Lechtenberg for his review (876pgs) for contained analysis of plaintiff's
1/23/18	JZ	75.00	.10	L320		injuries. Intake of plaintiff's records from
1/23/18		75.00		L130		Dr. Juraci Da Silva; Telephone conference with JoLynn of Dr. Richard Lechtenberg's office
1/23/18	НЈМ	75.00	.10	L130		regarding plaintiff's IME; Review and analysis of correspondence Cary Weiss of MedReview regarding

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	568682	540"			February 12, 2018
DATE ATTY	RATE	HOURS	TASK	ACT'Y	
1/23/18 HJM	75.00	.20	L130		PL's orthopedic IME; Telephone conference with Cary Weiss of MedReview regarding PL's
1/24/18 LPB	130.00	.10	L160		orthopedic IME; Review assignment of mediator for
1/24/18 AMB	175.00	.50	L120		judicial mediation;
1/24/18 AMB	175.00	.10	L450		
1/24/18 AMB	175.00	.10	L450		* FOR
1/24/18 AMB	175.00	.10	L120		
					34 / 1 O
1/24/18 AMB	175.00	.10	L120		Analysis or 1/24/18 correspondence from Court re: parties' response to court appointed mediator's proposed
1/24/18 SFT	75.00	.70	L320	A104	2/12/18 mediation; Review plaintiff's counsel bill of particulars and supplemental Bill of Particulars (15pgs) detailing plaintiff's injuries for continued
1/25/18 LPB	130.00	.10	L160		case analysis.  Review email from PC and the court mediator regarding scheduling the
1/25/18 RDL	175.00	.80	L120	A104	

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	568682	848		F	February 12, 2018
DATE ATTY	RATE	HOURS	TASK	ACT'Y	
1/25/18 JZ	75.00	.10	L320		Intake of plaintiff's records from Trinitas Regional Medical Center, Radiology Department;
1/25/18 JZ	75.00	.10	L320		Review and analysis of a CD from Trinitas Reginal Medical Center to ensure the completeness and compliance per plaintiff's
1/25/18 JZ	75.00	.10	L320		authorization and our request; Telephone conference with Bryan Home Improvement Corp. re: follow-up for plaintiff's records;
1/25/18 JZ	75.00	.10	L320		Telephone conference with Newark Rehabilitation re: follow-up for plaintiff's records;
1/25/18 JZ	75.00	.10	L320		Telephone conference with The Back Institute re: follow-up for additional plaintiff's records;
1/25/18 JZ	75.00	.10	L320		Telephone conference with Dr. Colon's assistant re: follow-up for additional plaintiff's records;
1/25/18 JZ	75.00	.10	L320		Telephone conference with Rosenblum Eye Center re: follow-up for plaintiff's records, and arranging
1/25/18 HJM	75.00	.10	L130		charts to us by fax free of charge; Review and analysis correspondence from David Altman of MedReview regarding plaintiff's pending
1/25/18 SFT	75.00	.30	L320	A103	orthopedic IME review; Draft follow-up correspondence letter to Dr. Lechtenberg re: plaintiff's original films and report of his
1/26/18 LPB	130.00	.50	L190		cervical spine Review experts reports for argument of a grave injury;
1/26/18 RDL	175.00	. 90	L120	A101	or a grave injury,

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	568682		February 12, 2018
DATE ATT	RATE HOU	RS TASK ACT'	Y
			ec ec
1/26/18 JZ	75.00 .:	10 L320	Telephone conference with Dr. Michael Seidenstein's assistant re: plaintiff's recent visits and related records request;
1/26/18 JZ	75.00 .:	20 L320	Letter to Bryan Home Improvement Corp. re: follow-up for plaintiff's records;
1/26/18 JZ	75.00	10 L320	Intake of plaintiff's records from Rosenblum Eye Center;
1/26/18 HJM	75.00 .:	20 L130	Telephone conference with Carry Weiss of MedReview regarding plaintiff's pending orthopedic IME;
1/26/18 HJM	75.00	20 L130	Further telephone conference with Carry Weiss of MedReview regarding plaintiff's pending orthopedic IME;
1/26/18 HJM	75.00	10 L130	Correspondence to Carry Weiss of MedReview regarding plaintiff's
1/26/18 HJM	75.00	30 L130	pending orthopedic IME; Telephone conference with Tizi of Dr. Richard Lechtenberg's office regarding Dr. Lechtenberg's report
1/26/18 HJM	75.00 .	20 L130	pertaining to plaintiff's IME;
1/26/18 HJM	75.00	10 L130	· · · · · · · · · · · · · · · · · · ·
1/26/18 HJM	75.00	10 L130	
1/26/18 MXK	75.00	20 L140	Called and left a message for Lisa in

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	568682	O.		February 12, 2018
DATE	ATTY	RATE	HOURS	TASK	C ACT'Y
					order to try and get Judge DiBlasi's availability for the week of February 12th;
1/29/18	LPB	130.00	.10	L340	
1/29/18	AMB	175.00	.10	L160	Telephone call to plaintiff's counsel re: mediation, expert depositions, orthopedic IME and 3/12/18 trial;
1/29/18	AMB	175.00	.10	L160	
1/29/18	AMB	175.00	.10	L160	Telephone call to counsel for third-party defendant Bryan's re: mediation, expert depositions, orthopedic IME, surveillance on
1/29/18	AMB	175.00	10	L160	plaintiff and 3/12/18 trial; Telephone conference with plaintiff's counsel re: mediation, expert depositions, orthopedic IME and 3/12/18 trial;
1/29/18	HJM	75.00	.10	L110	
1/29/18	НЈМ	75.00	.20	L130	Telephone conference with Cary Weiss of MedReview regarding pending orthopedic IME of plaintiff;
1/29/18	HJM	75.00	.20	L130	
1/29/18	HJM	75.00	.10	L130	Review and analysis of correspondence from Cary Weiss of MedReview regarding pending orthopedic and life
1/30/18	LPB	130.00	10	L160	care planner IMEs of plaintiff; Review email from Court mediator regarding scheduling the SDNY mediation;

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

ROR	T.ECAT.	SERVICES	

Invoice	# 568682		F	ebruary 12, 2018
DATE AT	TY RATE	HOURS T	ASK ACT'Y	
1/30/18 LP	B 130.00	.10 L	160	
1/30/18 LF	PB 130.00	.30 L	340	Review CVs of experts recommended for ortho and life care interviews;
1/30/18 LF	PB 130.00	.20 L	190	
1/30/18 LF	PB 130.00	1.30 L	240	
1/30/18 RI	DL 175.00	.10 L	120 A104	у.
1/30/18 RI	DL 175.00	) .30 L	J120 A106	
1/30/18 AM	18 175.00	) .30 L	160	Telephone conference with plaintiff's counsel re: mediation, expert depositions, orthopedic IME and
1/30/18 AN	MB 175.00	.40 L	160	3/12/18 trial; Telephone conference with counsel for third-party defendant Bryan's re: mediation, expert depositions,
1/30/18 AN	MB 175.00	) .10 L	160	orthopedic IME and 3/12/18 trial; Analysis of 1/30/18 correspondence from counsel for third-party defendant Bryan's re: proposed federal mediation dates;
1/30/18 AM	MB 175.00	1.30 L	160	rederal mediation dates;

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	568682	1#1		F	ebruary'	12,	2018	}			
DATE	ATTY	RATE	HOURS	TASK	ACT'Y							
1/30/18	AMB	175.00	.40	L160								
				x								
												— <u>.</u>
1/30/18	AMB	175.00	2.60	L160		1.101 1.11-11	<b>1</b>					
1/30/18	AMB	175.00	.10	L160		Analysi from Da court s	yton	P. H	laigne	ey, E	sq. r	
1/30/18	MXK	75.00	.20	L140		Called at NAM mediati	and rega	left	Lisa	anot	her m	nessage
1/30/18	MXK	75.00	.20	L140		Called	back			n NAM	and	left
1/31/18	LPB	130.00	<sub>3</sub> . 10	L160		another Draft e regardi schedul	mail ng o	to C ur av	Court vailab	oilit;	y for	
1/31/18	LPB	130.00	1.20	L240		Review to oppo	the					
1/31/18	AMB	175.00	10	L160		to oppo	50;		54		12	¥0:
									-			
1/31/18	AMB	175.00	.10	L160							*	en en
1/31/18	AMB	175.00	. 10	L160								

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	ice#	568682	141		I	February	12,	2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y			
1/31/18	НЈМ	75.00	, 20	L130		Dr. Rich regardin	ard ng pi Lect	onference with JoLynn of Lecthenberg's office laintiff's medical records thenberg's report of
1/31/18	MXK	75.00	a, 30	L140	A110	Called N availabi	IAM d lity vide	to get Judge DiBlasi's y for the week of 2/12 ed me with available dates
TOTAL FE	EES	en e e e e e fi			• •		\$ 6,695.50	

DATE RATE		UNITS	TASK	NT EXPENSE NAME
1/02/18 1/02/18 1/02/18 1/02/18 1/02/18 1/02/18 1/02/18	.10 .10 .10 .10 .10 .10	4.00 4.00 2.00 2.00 20.00 20.00 5.00	E101 E101 E101 E101 E101 E101	.40 Duplicating .40 Duplicating .20 Duplicating .20 Duplicating 2.00 Duplicating 2.00 Duplicating 1.25 Telecopier -Out, Phone#:
1/03/18 1/03/18 1/03/18 1/05/18 1/05/18 1/05/18 1/05/18	.10 .10 .10 .10 .10 .10	1.00 1.00 1.00 2.00 5.00 5.00	E101 E101 E101 E101 E101 E101	(212) 805-7933 .10 Duplicating .10 Duplicating .10 Duplicating .10 Duplicating .20 Duplicating .50 Duplicating .50 Duplicating .50 Duplicating .50 Duplicating

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	568682			February 1	2, 2018
DATE RATE		UNITS	TASK	NT E	XPENSE NAME
1/05/18	.10	2.00	E101	.2	
1/05/18	. 25	3.00	E104	. 7	Telecopier -Out, Phone#: (212) 267-4262
1/08/18	.10	1.00	E101	.1	
1/08/18 1/08/18	.10 .10	2.00 19.00	E101 E101	.2 1.9	
	.10	19.00	птот		LAURIE
1/08/18	.10	103.00	E101	10.3	Duplicating - BEATUS LAURIE
1/08/18	.10	72.00	E101	7.2	Duplicating - BEATUS LAURIE
1/08/18	.10	54.00	E101	5.4	Duplicating - BEATUS LAURIE
1/08/18	.10	72.00	E101	7.2	
1/08/18	.10	5.00	E101	.5	
1/08/18	.10	58.00	E101	5.8	Duplicating - BEATUS LAURIE
1/08/18	.10	11.00	E101	1.1	
1/08/18	.10	322.00	E101	32.20	
1/09/18	.10	2.00	E101	. 20	
1/09/18	.10	15.00	E101	1.50	Duplicating - BEATUS LAURIE
1/09/18	-10	22.00	E101	2.20	Duplicating - BEATUS LAURIE
1/09/18	.10	4.00	E101	. 4 (	
1/11/18	.10	10.00	E101	1.00	Duplicating - BEATUS LAURIE
1/12/18	.10	2.00	E101	.20	
1/12/18	.10	3.00	E101	.30	
1/16/18	.10	3.00	E101	.30	
1/16/18	.10	5.00	E101	.50	
1/16/18	.10	2.00	E101	.20	
1/18/18	.10	51.00	E101	5.10	
1/18/18	.10	56.00	E101	5,60 ,20	
1/19/18	.10	2.00	E101	€. ∠ (	Dupiteacting

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	568682	200		February 12,	2018
DATE RATE		UNITS	TASK	NT EXP	ENSE NAME
1/19/18	.10	2.00		.20	
1/19/18	.10		E101	.20	Duplicating
1/19/18	.25	3.00	E104	.75	Telecopier -Out, Phone#: (184) 421-717*
1/22/18	.10	121.00	E101	12.10	, ,
1/22/18	.10	838.00		83.80	
1/25/18			E105	.16	
					(OUTGOING), Phone#: (845)
1/25/18			E105	.16	·
_,,					(OUTGOING), Phone#: (845)
					641-4666
1/26/18	.10	11.00	E101	1.10	Duplicating - BEATUS LAURIE
1/26/18	.10	2.00	E101	.20	Duplicating
1/26/18	.10	5.00	E101	.50	Duplicating
1/26/18			E105	4.16	Long Dist. Tel., Extn
					(OUTGOING), Phone#: (504)
1 /05/10			D105	1.0	638-9011
1/26/18			E105	¥16	Long Dist. Tel., Extn (OUTGOING), Phone#: (631)
					678-5100
1/29/18	.10	158.00	E101	15.80	Duplicating -
1/29/18	.10	581.00		58.10	Duplicating -
1/29/18	.10	830.00		83.00	Duplicating -
1/30/18			E105	1.60	Long Dist. Tel., Extn (OUTGOING), Phone#: (770)
					384-5728
1/31/18			E100		

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 149 of 215

930 83092

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Atlanta, GA 30339-4024

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

# FOR LEGAL SERVICES

Invoice# 569615

March 12, 2018

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc
Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296

Our File No. 930-83092(005)

INTERIM BILL

GL-16-11-17780

Previous Outstanding Balance

\$ .00

Fees for Professional Services Through February 28, 2018 \$ 14,306.00

# SERVICES SUMMARY

ATTORNEY	HOURS	RATE	AMOUNT
Laurie P. Beatus Arturo Boutin Robert D. Lang Helen McDonald Jerome Smith Sandy F. Thomas James Zhu	36.70 47.40 5.20 1.40 1.90 .40	130.00 175.00 175.00 75.00 75.00 75.00	4,771.00 8,295.00 910.00 105.00 142.50 30.00 52.50
	93.70		\$ 14,306.00

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 569615

March 12, 2018

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP Claim No. Date of Loss : TBP

: Ms. Becky R. Popson Examiner : Home Depot U.S.A.Inc Defendant

: Daniel Rivera Claimant Our Tax I.D. No. : 13-2916296 Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

To legal services rendered and disbursements advanced during the period of February 1, 2018 through February 28, 2018; such legal services consisting of the following:

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
2/01/18	LPB	130.00	.30	L340		Telephone call with service provider regarding recommendations for ortho and for life coach assessment;
2/02/18	RDL	175.00	.20	L160	A104	Review and analysis of the February 2, 2018 court report regarding the first mediation session scheduled for March 2, 2018 at the United States
2/02/18	AMB	175.00	.30	L160		courthouse in Manhattan; Telephone conference with plaintiff's counsel re: plaintiff's motion for a determination of sustaining a serious
						<pre>injury in preparation for 2/7/18 mediation (multiple attorneys authorized)</pre>
2/02/18	SFT	75.00	.20	L320	A108	Lechtenberg's office re: payment of the supplement independent medical examination (IME) report, original
						films sent for his review prior and

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	lce#	569615			I.	March 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
2/02/18	SFT	75.00	.10	L320	A104	invoice of plaintiff's independent medical examination (IME) report. Review e-mail correspondence from Dr. Lechtenberg's office re: plaintiff's Independent medical examination (IME), and review of medical records
2/04/18	AMB	175.00	3.80	L160		invoice. Drafting Home Depot's confidential mediation statement re: liability and damages argument, including applicability of the grave injury exception to Worker's Compensation
2/05/18	AMB	175.00	1.90	L240	A104	Law's bar to an employee suing his employer [SUNDAY]; Analysis of plaintiff's opposition to third-party defendant Bryan's motion for summary judgment on Home Depot's third-party claims re: affirmation and memorandum of law in support of
2/05/18	AMB	175.00	.10	L160		opposition; Analysis of 2/5/18 correspondence from NAM re: 2/7/18 authorized
2/05/18	AMB	175.00	.10	L160		mediation appearance; Analysis of further 2/5/18 correspondence from NAM re: 2/7/18 authorized mediation appearance;
2/05/18	AMB	175.00	.20	L130		additional mediation appearance,
2/05/18	НЈМ	75.00	.10	L160		Draft correspondence to John Hannauer of NAM regarding scheduled
2/05/18	HJM	75.00	.10	L130		arbitration; Review and analysis of correspondence from Cary Weiss of MedReview regarding plaintiff's further IME;
2/05/18	HJM	75.00	.10	L160		Review and analysis of correspondence from John Hannauer of NAM regarding

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	569615	74		1	March 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
2/05/18	HJM	75.00	.20	L130		scheduled arbitration;
2/05/18	HJM	75.00	.20	L130		g
2/06/18	LPB	130.00	1.70	L160		Commence drafting opposition to PL's MSJ;
2/06/18	LPB	130.00	1.00	L160		Commence drafting Rule 56.1 statement in opposition to PL's MSJ;
2/06/18	LPB	130.00	.80	L160		Commence drafting Rule 56.1 statement in opposition to Bryan's MSJ;
2/06/18	LPB	130.00	1.40	L160		Commence drafting memo in opposition to Bryan's MSJ;
2/06/18	RDL	175.00	.20	L240	A104	Review and analysis of the February 6, 2018 court report regarding ruling on pending motion for summary judgment to be made on March 8, 2018, all other court deadlines and hearings to remain in full force and effect;
2/06/18	AMB	175.00	.40	L160		
2/06/18	AMB	175.00	.40	L160		
2/06/18	AMB	175.00	.10	L240		Analysis of 2/6/18 Order re: notice to all parties that pending summary judgment motions would be decided at
2/06/18	НЈМ	75.00	.10	L130		3/8/18 Trial Conference;
2/06/18	HJM	75.00	.10	L160		Review and analysis correspondence

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	569615			N	March 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
2/07/18 2/07/18		130.00 175.00	1.30	L160 L160	A103	from NAM regarding the February 7, 2018 mediation; Prepare documents for mediation;
2/07/18	AMB	175.00	.80	L160		Travel time to and from NAM re: authorized mediation; (half time)
2/07/18	AMB	175.00	3.40	L160		Appearance at NAM, including drafting in-session reports to Home Depot re: authorized mediation, travel time not
2/07/18	AMB	175.00	.10	L160		included;
2/07/18	AMB	175.00	.40	L160		
2/07/18	AMB	175.00	.90	L160		J.
2/07/18	AMB	175.00	.10	L160		7 E
2/07/18	AMB	175.00	.10	L160		Analysis of 2/7/18 correspondence from mediator Judge DiBlasi re: requested further mediation session;
2/07/18	AMB	175.00	.10	L160		requested further mediation session;
2/07/18	AMB	175.00	.10	L160		
2/08/18	LPB	130.00	1.30	L160	87	Continue drarting Rule 56.1 statement

March 12, 2018

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

# FOR LEGAL SERVICES

Invoice# 569615

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	~
2/08/18		130.00		L160		in opposition to PL's MSJ; Continue drafting memo of law in opposition to PL's MSJ; Continue drafting Rule 56.1 statement
2/08/18 2/08/18		130.00		L160		in opposition to Bryan's MSJ; Continue drafting memo in opposition to Bryan's MSJ:
2/08/18	RDL	175.00	ı <b>.</b> 50	L160	A109	
2/08/18	RDL	175.00	.50	L160	A101	
						đ
2/08/18	JZ	75.00	.20	L320		Telephone conference with Bryan Home Improvement Corp. re: follow-up for plaintiff's records;
2/08/18	JZ	75.00	.10	L320		Telephone conference with Dr. Michael Seidenstein re: follow-up for plaintiff's records;
2/08/18	JZ	75.00	10	L320		Telephone conference with St. Joseph Imaging Center re: follow-up for
2/08/18	JZ	75.00	.20	L320		plaintiff's records; Telephone conference with NYS Workers' Compensation Board re:
2/09/18	LPB	130.00	.80	L240		follow-up for plaintiff's records; Finalize the draft of Rule 56.1 statement in opposition to PL's MSJ;
2/09/18	LPB	130.00	1.40	L240		Finalize the draft of the memo of law in opposition to PL's MSJ;
2/09/18	LPB	130.00	.60	L160		Finalize the draft of the Rule 56.1 statement in opposition to Bryan's MSJ;
2/09/18	LPB	130.00	1.10	L240		Finalize the draft of the memo in opposition to Bryan's MSJ;
2/09/18	LPB	130.00	.40	L240		Finalize the draft of the attorney

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	569615			Ν	March 12	2, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y		
2/09/18	LPB	130.00	.50	L160		MSJ; Finaliz affirma	tion in opposition to PL's the draft of the attorney tion in opposition to Bryan's
2/09/18	HJM	75.00	.20	L130		Dr. Ric regardi	one conference with Tizzi of hard Lechtenberg's office ng status of plaintiff's IME
2/09/18	НЈМ	75.00	.20	L130		Tizzi o office	telephone conference with of Dr. Richard Lechtenberg's regarding status of
2/10/18	AMB	175.00	3.40	L240		Draftin opposit summary Section analysi includia a mater possible	aff's IME report; ag additions to Home Depot's aion to plaintiff's motion for a judgment on his Labor Law a 240 and 241(6) claims re: as of exchanged discovery, and party depositions, showing aial issue of fact as plaintiff ay being sole proximate cause alleged accident [SATURDAY];
2/10/18	AMB	175.00	1.80	L240		opposit Bryan's re: dist third-p	ag additions to Home Depot's ion to third-party defendant motion for summary judgment missal of Home Depot's party common law fication claims [SATURDAY];
2/12/18	LPB	130.00	.90	L240		Finaliz	e the Rule 56.1 statement in ion to PL's MSJ;
2/12/18	LPB	130.00	1.30	L240		Finaliz	e the memo of law in ion to PL's MSJ;
2/12/18	LPB	130.00	.80	L160		Finaliz	e the Rule 56.1 statement in ion to Bryan's MSJ;
2/12/18		130.00				Finalize Bryan's	e the memo in opposition to MSJ;
2/12/18	ГЬВ	130.00	.20	L240			e the attorney affirmation in ion to PL's MSJ and review

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	569615	(4)		I	March 12,	2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y		
2/12/18	LPB	130.00	.50	L160		Finalize opposition the exhibit	to the motion; the attorney affirmation in on to Bryan's MSJ and obtain oits to be provided to the
2/12/18	LPB	130.00	.30	L160		Court;;	
2/12/18	RDL	175.00	.40	L430	A106		
							3
2/12/18	AMB	175.00	.10	L160		from cour defendant	of 2/12/18 correspondence usel for third-party Bryan's Home Improvement
2/12/18	AMB	175.00	.10	L160		proceed won 2/13/1 Analysis from plai for third Home Impr	notice that they will not with second mediation at NAM .8; of 2/12/18 correspondence
2/12/18	AMB	175.00	.10	L160		with second 2/13/18; Telephone third-par Improvement	e call to counsel for cty defendant Bryan's Home ent Corp. re: his notice that not proceed with second
2/12/18	AMB	175.00	.30	L160		mediation Telephone counsel r Bryan's F counsel's	at NAM on 2/13/18; conference with plaintiff's ce: third-party defendant Home Improvement Corp.'s 2/12/18 notice that they proceed with second
2/12/18	AMB	175.00	.30	L160			n at NAM on 2/13/18;

FOR	T.ECAT.	SERVICES

Invoice#	569615		March 12, 2018
DATE ATTY	RATE HOURS	TASK ACT'Y	
			e. No
2/12/18 AMB	175.00 .10	L160	
2/12/18 AMB	175.00 .10	L160	· · · · · · · · · · · · · · · · · · ·
2/12/18 AMB	175.00 .10	L160	Further telephone call to counsel for third-party defendant Bryan's Home Improvement Corp. re: his notice that they will not proceed with second mediation at NAM on 2/13/18;
2/12/18 AMB	175.00 .20	L160	mediation at Nam on 2/13/10/
2/12/18 AMB	175.00 .20	L160	Telephone conference with counsel for third-party defendant Bryan's Home Improvement Corp. re: reason why they cancelled second mediation at NAM on 2/13/18;

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	569615	31		Ma	arch 12, 2	018	
DATE	ATTY	RATE	HOURS	TASK	ACT'Y			
2/12/18	AMB	175.00	.10	L130	1	neurologis	call to retained t Dr. Lechtenberg re: plaintiff's neurological	
2/12/18	AMB	175.00	.10	L130	] ] :	Further te neurologis	lephone call to retained t Dr. Lechtenberg re: plaintiff's neurological	
2/12/18	AMB	175.00	.20	L160		THE,		
2/12/18	AMB	175.00	.10	L160				
2/12/18	AMB	175.00	.10	L130	]	neurologis results of	conference with retained to Dr. Lechtenberg re: plaintiff's neurological	
2/12/18	AMB	175.00	.40	L130	; 1 :	Richard Le report re: on plainti	of retained neurologist Dr. echtenberg's 1/30/18 IME assessment of IME results ff's claimed grave injury	
2/12/18	AMB	175.00	. 40	L130	-	to his lef	t hand and arm;	

FOR LEGAL S	PROTTORS

Invoi	ice#	569615	341		И	March 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
2/12/18	AMB	175.00	.10	L230		
2/13/18 2/13/18				L190 L130		Telephone conference with counsel for third-party defendant Bryan's Home Improvement Corp. re: his request for copy of retained neurologist Dr.
2/13/18	AMB	175.00	.10	L130		Richard Lechtenberg's 1/30/18 IME report;
2/13/18	AMB	175.00	.10	L130		
2/13/18	AMB	175.00	.10	L130		3
2/13/18	AMB	175.00	.10	L240		Analysis of 2/13/18 motion by counsel

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice	569615	247		M	March 12, 2018
DATE AT	Y RATE	HOURS T	TASK Z	ACT'Y	
	4				for third-party defendant Bryan's Home Improvement Corp. re: request to extend its time to serve a reply affirmation in response to plaintiff's opposition to its motion for summary judgment;
2/14/18 LP	130.00	.40 I	L240		Review PC's opposition to Bryan's motion
2/14/18 AM	175.00	.10 I	L320		MOCIOII
2/14/18 AM	175.00	.20 I	L320		
2/14/18 AM	175.00	.10 I	L130		<b>%</b> .
2/14/18 AM:	175.00	.80 I	L130		* 2
2/14/18 AM	175.00	.20 I	L130		
2/14/18 AM	175.00	.20 I	130		
2/14/18 AM	175.00	.20 I	L250		Analysis of third-party defendant Bryan's Home Improvement Corp.'s counsel's 2/13/18 correspondence to Court re: request for leave to conduct IMEs of plaintiff, extend time to exchange expert reports and

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	569615			ľ	March 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
2/14/18	AMB	175.00	.40	L440		adjourn 3/12/18 trial; Analysis of 2/14/18 correspondence from Court re: plaintiff's subpoenas for his medical records from St. Joseph's Hospital and Dr. Juraci Da
2/14/18	JZ	75.00	.10	L320		Silva; Review and analysis of correspondence from Iron Mountain re: search result on request per plaintiff's
2/14/18	JXS	75.00	.10	L140		authorization; Obtain copy of so-order letter, from judge Forrest dated 2/13/18:
2/14/18	JXS	75.00	.40	L140		Review Judge Forrest's motion rules and to confirm delivery of courtesy copies:
2/14/18	JXS	75.00	.50	L140		Review Deceleration of Laurie P. Beatus in opposition to Bryans' motion for summary Judgment w/ exhibit A-J, to comply with ECF/CM and e-filing rules:
2/14/18	JXS	75.00	.10	L140		E-filed Declaration of Laurie Beatus in opposition to Bryan's motion for summary judgment and with exhibits A through J:
2/15/18	LPB	130.00	.30	L340		Review letter motion by Bryan's regarding production of IME report;
2/15/18	AMB	175.00	.10	L240		Analysis of 2/15/18 telephone call from Court re: Home Depot's opposition to third-party defendant Bryan's motion for summary;
2/15/18	AMB	175.00	.10	L240		Telephone call to the Court re: Home Depot's opposition to third-party defendant Bryan's motion for summary;
2/15/18	AMB	175.00	.10	L240		Telephone conference with the Court re: request that Home Depot re-file its memorandum of law in opposition to third-party defendant Bryan's motion for summary;

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	569615	,(a),		1	March 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
2/15/18	AMB	175.00	.30	L250		Analysis of plaintiff's counsel's 2/15/18 correspondence to Court re: plaintiff's opposition to third-party defendant Bryan's Home Improvement Corp.'s counsel's 2/13/18 correspondence to Court requesting leave to conduct IMEs of plaintiff, extend time to exchange expert
2/15/18	AMB	175.00	.10	L160		
2/15/18	JXS	75.00	.10	L140		Review Memorandum of Law of defendant's Home Depot, date 2/12/18, to comply with ECF/CM and Local Federal rules:
2/15/18	JXS	75.00	.10	L140		Review Defendant Home Depot  Memorandum of Law in Opposition to plaintiff's summary Judgment motion to comply with ECF/CM and Local and Judge Forrest Rules:
2/15/18	JXS	75.00	.30	L140		E-file defendant's memorandum of law in opposition to plaintiff's partial summary judgment, dated 2/12/18:
2/16/18	AMB	175.00	.30	L250		Drafting proposed Home Depot's response re: opposition to third-party defendant Bryan's Home Improvement Corp.'s counsel's 2/13/18 correspondence to Court requesting leave to conduct IMEs of plaintiff, extend time to exchange expert reports and adjourn 3/12/18 trial;
2/16/18	AMB	175.00	.40	L250		# * ·

POD	TECAT	SERVICES
FUR	LEGAL	SEKVICES

Invoi	Lce#	569615	343		Ma	arch	12,	2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y			
					1	t		
2/16/18	AMB	175.00	.10	L250				
								۵
2/16/18	AMB	175.00	. 10	T <sub>1</sub> 250				
27 207 20		173.00						
2/16/18	AMB	175.00	1.10	L250				
- / /			-			- 7		
2/16/18	AMB	175.00	.10	L250	j	from	Cou	of 2/16/18 Memo Endorsement rt re: directive to provide rty defendant Bryan's Home
					]	Impro Lecht of th	oveme cenbe neir	ent Corp. with copy of Dr. erg's IME report and denial request to conduct IMEs and
2/16/18	AMB	175.00	_ 20	L250	ć	adjou	ırn t	crial;

March 12, 2018

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR	T.ECAT.	SERVICES

Invoice# 569615

DATE ATTY RATE HOURS TASK ACT'Y

DAIE	Alli	KAIL	HOURS	AGAI	ACIT	
2/16/18	AMB	175.00	.10	L250		» — II
2/16/18	JXS	75.00	.10	L140		Review Uniform rule 202.21 to compute due date to strike Note of Issue on 3/12/18:
2/16/18	JXS	75.00	.10	L140		Review order dated 1/17/18 to determine due date to move for
2/18/18	AMB	175.00	.10	L160		summary judgment motion on 4/9/18:
2/19/18	RDL	175.00	.10	L160	A103	
2/19/18	AMB	175.00	30	L130		Drafting correspondence to third-party defendant Bryan's Home Improvement Corp.'s counsel re: Home Depot's compliance with 2/16/18 Memo Endorsement from Court providing counsel with a copy of Dr. Lechtenberg's IME report and request [FIRM HOLIDAY];
2/20/18	LPB	130.00	.40	L240		Review reply to opposition to MSJ by Bryan's;
2/20/18	AMB	175.00	.90	L240		Analysis of plaintiff's reply memorandum of law in support of motion for summary judgment on his

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	ice#	569615	76.1			March 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
						Labor Law Sec. 240 and 241(6) claims re: argument that there is no issue of fact that said Sections were violated and plaintiff was not the sole proximate cause of his alleged accident;
2/20/18	AMB	175.00	.20	L130		Analysis of third-party defendant Bryan's counsel's 2/16/18 correspondence re: request for Dr. Lechtenberg's neurological IME report per Court's 2/16/18 memo Endorsement;
2/20/18	AMB	175.00	.10	L240		Telephone conference with plaintiff's counsel re: their request that we accept a subpoena for Jorge Palacios' appearance at trial;
2/20/18	AMB	175.00	. 70	L240		
2/20/18	AMB	175.00	.10	L130		
2/20/18	AMB	175.00	.30	L130		

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	Lce#	569615	245		ľ	March	12,	2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y			
2/20/18	AMB	175.00	.10	L440				
2/20/18	AMB	175.00	.10	L160				
2/20/18	AMB	175.00	.10	L160				
, ,								
2/20/18	AMB	175.00	.90	L240		Bryan reply dismi commo	's l Af: ss l n la	of third-party defendant Home Improvement Corp.'s Firmation re: its motion to Home Depot's claims for aw indemnification and
2/21/18	LPB	130.00	.10	L190		contr	ıbu	cion;
2/21/18	LPB	130.00	.20	L240				C's motion to strike the IME
2/21/18	RDL	175.00	.10	L160	A103	repor	L;	
2/21/18	AMB	175.00	.10	L160		Judge he co defen	Jol ntac dan	ed telephone call to mediator on DiBlasi re: request that ct counsel for third-party bryan's Home Improvement
2/21/18	AMB	175.00	.30	L160		Draft media reque third Impro	ing tor st -pa: veme	ncerning a second mediation; authorized correspondence to Judge John DiBlasi re: that he contact counsel for try defendant Bryan's Home ent Corp. concerning a second
2/21/18	AMB	175.00	.10	L130		media	.0101	11 ; en

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	569615	W		1	March 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
2/21/18	AMB	175.00	.20	L160		Telephone call to third-party defendant Bryan's Home Improvement Corp.'s counsel re: its position on a second mediation prior to 3/12/18
2/21/18	AMB	175.00	.40	L130		Trial;
2/21/18	AMB	175.00	.90	L240		
2/21/18	AMB	175.00	.10	L240		Analysis of 2/21/18 correspondence from plaintiff's counsel to Court, copy to me re: request to disregard Dr. Lechtenberg's IME report submitted in support of third-party defendant Bryan's Home Improvement
2/21/18	AMB	175.00	.20	L240		Corp.:
2/21/18	AMB	175.00	.10	L160		

BUD .	LECAL.	SERVICES

Invoice#	569615	1	March 12, 2018
DATE ATTY	RATE HOURS	TASK ACT'Y	
			.75 91 = 2242
2/21/18 AMB	175.00 .10	L160	
2/21/18 AMB	175.00 .10	L130	
2/21/18 AMB	175.00 .30	L130	
2/21/18 AMB	175.00 .40	L130	Analysis of plaintiff's counsel's counter letter to Court re: striking of Dr. Lechtenberg's IME report from
2/21/18 AMB	175.00 .20	L130	submission to Court by third-party defendant Bryan's Home improvement Corp.;
			- ** *
2/21/18 AMB	175.00 .10	L130	

EOD	TECAT	SERVICES

Invo	ice#	569615	SI.		I	March 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT	
2/21/18	SFT	75.00	.10	L320	A104	Review e-mail correspondence from Dr. Lechtenberg's office re: plaintiff's
2/22/18	RDL	175.00	.20	L160	A106	independent medical examination.
2/22/18	RDL	175.00	.10	L160	A103	
2/22/18	AMB	175.00	.10	L160		Telephone conference with counsel for third-party defendant Bryan's Home Improvement Corp.'s re: his claims
2/22/18	AMB	175.00	.10	L160		examiner's contact information for proposed direct telephone conference with Home Depot on settlement status;
2/22/18	AMB	175.00	.10	L160		
2/22/18	AMB	175.00	.10	L160		.x.

F	OR LEGAL SI	ERVICES				
Inv	oice#	569615	(W.)		1	March 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT	
2/22/1	8 AMB	175.00	.20	L160	third-party defendant Bryan's Ho Improvement Corp.'s re: scheduli second mediation with NAM mediat	Telephone conference with counsel for third-party defendant Bryan's Home Improvement Corp.'s re: scheduling of second mediation with NAM mediator Judge DiBlasi;
2/22/1	8 AMB	175.00	10	L160		Judge Diblasi;
2/22/1	8 AMB	175.00	.30	L160		
2/22/1	8 AMB	175.00	.10	L160		Analysis of 2/22/18 correspondence from mediator Judge DiBlasi re: status of authorized second
2/22/1	8 AMB	175.00	.10	L160		mediation; Drafting response to 2/22/18 correspondence from mediator Judge DiBlasi re: status of authorized
2/22/1	8 AMB	175.00	. 20	L160		second mediation;
2/22/1	8 AMB	175.00	.10	L160		Analysis of 2/22/18 vmm from mediator Judge DiBlasi re: status of authorized second mediation;

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	ice#	569615			I	March 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
2/22/18	AMB	175.00	.10	L160		
2/22/18	JXS	75.00	.10	L140		Obtain copy of Subpoena, dated 2/20/18 upon Jorge Palacios, for testimony at a trial on 3/12/18 In United State Southern District Court
2/23/18	LPB	130.00	.10	L160		Review email from client request for information on mediation;
2/26/18	LPB	130.00	.50	L160		Telephone conference call with PC and Bryan's counsel regarding status of
2/26/18	LPB	130.00	3.50	L160		submission of the joint trial order, and mediation; Commence reviewing the proposed joint order initially drafted by PC to be submitted;
2/26/18	RDL	175.00	.30	L160	A104	to be submitteed,
2/26/18	RDL	175.00	.30	L160	A103	
2/26/18	RDL	175.00	.10	L160	A103	;
2/26/18	AMB	175.00	.10	L160		

FOR	T.RCAT.	SERVICES

Invoice#	569615		March 12, 2018
DATE ATTY	RATE HOURS	TASK ACT'Y	•
2/26/18 AMB	175.00 .10	L160	Drafting response to 2/26/18 correspondence from NAM re: notice that third-party defendant Bryan's did not want to proceed with a second mediation with Judge John DiBlasi;
2/26/18 AMB	175.00 .10	L210	mediation with budge bonn biblasi,
2/26/18 AMB	175.00 .10	L120	Analysis of 2/26/18 correspondence from plaintiff's counsel re: request for a telephone conference on this matter;
2/26/18 AMB	175.0010	L120	Analysis of 2/26/18 correspondence from third-party defendant Bryan's counsel re: requested 2/26/18 telephone conference on this matter;
2/26/18 AMB	175.00 .10	L120	Analysis of further 2/26/18 correspondence from plaintiff's counsel re: request for a telephone conference on this matter;
2/26/18 AMB	175.00 .30	L160	
2/26/18 AMB	175.00 .40	L160	
			e <sup>ii</sup>
2/26/18 HJM	75.00 .10	L160	Review and analysis of correspondence from Lisa Amoroso of NAM regarding continued mediation;

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	569615	28	И	March 12, 2018
DATE ATTY	RATE	HOURS T	ASK ACT'Y	
2/27/18 LPB	130.00	1.60 L	160	Continue to review Proposed Joint Trial Submission by PC;
2/27/18 LPB	130.00	2.80 L	160	Review pattern jury instructions for the Joint order submission;
2/27/18 LPB	130.00	.40 L	160	Review the documents to be admitted into evidence;
2/27/18 LPB	130.00	.20 L	160	Telephone call with PC regarding HD's appearance at the mediation;
2/27/18 LPB	130.00	.20 L	240	Review the decision of the court denying the motion for summary
2/27/18 LPB	130.00	.50 L	160	judgment by Bryan's Review the Judges rules for the
2/27/18 RDL	175.00	.30 L	160 A104	joint pretrial order;
2/27/18 RDL	175.00	,20 L	160 A104	
2/27/18 RDL	175.00	.20 L	160 A103	ı
2/27/18 RDL	175.00	.20 L:	240 A10:	
2/27/18 RDL	175.00	.10 L:	240 A104	
2/27/18 RDL	175.00	.10 L	160 A103	v.

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	569615	848		I	March 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
2/27/18	RDL	175.00	.10	L160	A103	
2/28/18	LPB	130.00	1.40	L440		Continue to review additional pattern jury instructions for the Joint order
2/28/18	LPB	130.00	.20	L190		submission; Review order of the Court regarding
2/28/18	LPB	130.00	.80	L440		granting PLs SJ; Review voir questions revised for the joint order submission;
2/28/18	LPB	130.00	.70	L190		Telephone conference with PCs regarding submission of finalized
2/28/18	LPB	130.00	.50	L190		joint trial order; Review additions from Bryan's to the joint pretrial order;
2/28/18	RDL	175.00	.20	L160	A104	<u> </u>
2/28/18	RDL	175.00	.10	L160	A103	y
2/28/18	RDL	175.00	,10	L160	A104	
2/28/18 2/28/18		175.00 175.00		L110 L160	A103 A103	Conduct Internet search on mediator;
2/28/18	RDL	175.00	.10	L240	A103	
						o.
2/28/18	AMB	175.00	, 20	L160		Authorized telephone conference with

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	569615			March 12, 2018	
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
2/28/18	AMB	175.00	.10	L160	NAM mediator Judge John DiBlasi re: his rejection of Home Depot's reque that he contact federal assigned mediator on case;	
2/28/18	AMB	175.00	.70	L240	Analysis of 2/28/18 Order re: granting of plaintiff's partial motion for summary judgment on his Labor Law Sections 240 and 241(6)	
2/28/18	AMB	175.00	1.10	L240	statement re: liability and damages	}
2/28/18	AMB	175.00	.40	L240	argument at 3/2/18 mediation;	
2/28/18	AMB	175.00	.20	L240	Analysis of 2/27/18 correspondence from third-party defendant Bryan's counsel to the Court, copy to me re request that the Court deny plaintiff's motion to strike Dr. Lechtenberg's IME report submitted support of Bryan's motion for summa	in
2/28/18	AMB	175.00	.10	L440	judgment;	2

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	569615	90		M	larch 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
2/28/18	AMB	175.00	.90	L250		counsel, copy to me re: status of its submissions to proposed joint trial submissions; Analysis of third-party defendant Bryan's Home Improvement Corp.'s Motion In Limine re: precluding evidence or testimony at trial concerning Quantitative
2/28/18	AMB	175.00	.10	L320		Electroencephalography;
2/28/18	AMB	175.00	.10	L250		Analysis of 2/28/18 correspondence from counsel for third-party defendant Bryan's Home Improvement Corp. re: position that plaintiff
2/28/18	AMB	175.00	.10	L320		does not have burden of proof to prove a grave injury:
2/28/18	AMB	175.00	.20	L440		Analysis of /28/18 Order re: directive for a joint letter from parties by 3/2/18 concerning
2/28/18	AMB	175.00	.40	L160		outstanding issues to be tried; Telephone conference with plaintiff's counsel re: third-party defendant Bryan's settlement discussions with
2/28/18	AMB	175.00	, 20	L160		counsel in preparation for 3/2/18 mediation:
2/28/18	AMB	175.00	.20	L160		

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	ice#	569615	(3)		March 12,	2018	
DATE	ATTY	RATE	HOURS	TASK ACT'	ď		
2/28/18	AMB	175.00	1.20	L440	Pretrial	Order re:	to proposed joint document and posed for trial;
2/28/18	AMB	175.00	4.40	L440	Drafting Pretrial questions	additions Order re:	to proposed joint
TOTAL FE	EES						\$ 14,306.00

DATE RAT	E	UNITS	TASK	NT EX	PENSE NAME
2/02/18			E119	1,150.00	Fees for Richard Lechtenberg, Independent Medical - Helen McDonald - Laurie Beatus
2/05/18	.10	16.00	E101	1.60	Duplicating - MALDONADO MIRIAM
2/05/18	.10	413.00	E101	41.30	Duplicating - MALDONADO MIRIAM
2/05/18	.10	19.00	E101	1.90	Duplicating
2/05/18	.10	413.00	E101	41.30	
2/06/18	.10	16.00	E101	1.60	Duplicating - BEATUS LAURIE
2/06/18	.10	19.00	E101	1.90	Duplicating - BEATUS LAURIE
2/06/18	.10	5.00	E101	.50	Duplicating
2/06/18	.10	19.00	E101	1.90	
2/06/18	.10	1.00	E101	.10	
2/06/18	.10	1.00	E101	.10	Duplicating

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	569615			March 12, 20	18	
DATE RATE	τ	NITS	TASK	NT EXP	ENSE NAME	
2/06/18	.10	3.00	E101	.30	Duplicating	
2/07/18	.10	54.00	E101	5.40	Duplicating LAURIE	- BEATUS
2/07/18	1.10	19.00	E101	1.90	Duplicating LAURIE	- BEATUS
2/07/18	.10	26.00	E101	2.60	Duplicating LAURIE	- BEATUS
2/07/18	.10	16.00	E101	1.60	Duplicating	DENERIC
2/09/18	.10	13.00	E101	1.30	Duplicating · LAURIE	- BEATUS
2/09/18	.10	11.00	E101	1.10	Duplicating	
2/09/18	.10	15.00	E101	1.50	Duplicating B LAURIE	- BEATUS
2/12/18	.10	103.00	E101	10.30	Duplicating - LAURIE	BEATUS
2/12/18	.10	72.00	E101	7.20	Duplicating - LAURIE	- BEATUS
2/12/18	.10	129.00	E101	12.90	Duplicating - LAURIE	- BEATUS
2/12/18	.10	13.00	E101	1.30	Duplicating - LAURIE	BEATUS
2/12/18	.10	54.00	E101	5.40	Duplicating - LAURIE	BEATUS
2/12/18	.10	16.00	E101	1.60	Duplicating = LAURIE	BEATUS
2/12/18	.10	123.00	E101	12.30	Duplicating - LAURIE	BEATUS
2/12/18	.10	46.00	E101	4.60	Duplicating - LAURIE	BEATUS
2/12/18	.10	8.00	E101	.80	Duplicating	
2/12/18	.10	3.00	E101	.30	Duplicating	
2/12/18	.10	4.00	E101	.40	Duplicating	
2/12/18	.10	9.00	E101	. 90	Duplicating	
2/12/18	.10	3.00	E101	.30	Duplicating	
2/12/18 2/12/18	.10 .10	12.00 13.00	E101 E101	1.20 1.30	Duplicating Duplicating	
2/12/18	.10	9.00	E101	.90	Duplicating	
, – , – -						

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	569615			March 12, 20	18
DATE RATE		UNITS	TASK	NT EXP	ENSE NAME
2/12/18	.10	9.00	E101	.90	Duplicating
2/12/18	.10	10.00	E101	1.00	Duplicating
2/12/18			E105	1.84	Long Dist. Tel., Extn
					(OUTGOING), Phone#: (504)
7					638-9011
2/14/18	.10	121.00	E101	12.10	Duplicating -
2/14/18	.10	1.00	E101	.10	Duplicating
2/14/18	.10	59.00	E101	5.90	Duplicating
2/14/18	.10	63.00	E101	6.30	Duplicating
2/14/18	.10	10.00	E101	1.00	Duplicating
2/14/18	.10	1.00	E101	.10	Duplicating
2/14/18	.10	1.00	E101	.10	Duplicating
2/14/18	.10	15.00	E101	1.50	Duplicating
2/14/18	.10	32.00	E101	3.20	Duplicating
2/14/18	.10	8.00	E101	.80	Duplicating
2/15/18	.10	10.00	E101	1.00	Duplicating
2/15/18	.10	9.00	E101	.90	Duplicating
2/16/18	.10	3.00	E101	.30	Duplicating
2/16/18	.10	27.00	E101	2.70	Duplicating
2/16/18	.10	4.00	E101	.40	Duplicating
2/16/18	.10	3.00	E101	.30	Duplicating
2/20/18	.10	3.00	E101	, 30	Duplicating
2/20/18	.10	5.00	E101	.50	Duplicating
2/26/18	.10	187.00	E101	18.70	Duplicating
2/26/18	.10	1.00	E101	.10	Duplicating
2/26/18	.10	13.00	E101	1.30	Duplicating
2/26/18	.10	12.00	E101	1.20	Duplicating
2/26/18	.10	1.00	E101	.10	Duplicating
2/26/18	.10	3.00	E101	.30	Duplicating
2/26/18	.10	4.00		.40	Duplicating
2/27/18	.10	14.00	E101	1.40	Duplicating - BEATUS
- / /					LAURIE
2/27/18	.10	10.00	E101	1.00	Duplicating
2/28/18			E100	-1,408.34	100% Expense Discount
2/28/18	.10	3.00	E101	30	Duplicating
2/28/18	.10	19.00	E101	1.90	Duplicating - BEATUS
					LAURIE

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	569615	165		March 12, 2018
DATE RATE	,	UNITS	TASK	NT EXPENSE NAME
2/28/18	10	12.00	E101	1.20 Duplicating - BEATUS LAURIE
2/28/18	.10	55.00	E101	5.50 Duplicating - BEATUS LAURIE
2/28/18	10	34.00	E101	3.40 Duplicating - BEATUS LAURIE
2/28/18	.10	80.00	E101	8.00 Duplicating - BEATUS LAURIE
2/28/18	.10	11.00	E101	1.10 Duplicating
2/28/18	.10	12.00	E101	1.20 Duplicating
2/28/18	.10	1.00	E101	.10 Duplicating
2/28/18	.10	3.00	E101	.30 Duplicating

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 181 of 215

930 83092

Ms. Becky R. Popson Commercial Litigation Unit Home Depot U.S.A., Inc. 2455 Paces Ferry Road, N.W., Bldg. B-10 Atlanta, GA 30339-4024

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR LEGAL SERVICES

Invoice# 570485

April 12, 2018

Home Depot GLSL Rtnr/Rivera, Daniel RE:

Litigation No. : GL-16-11-17780

Date of Loss : TBP
Examiner : Ms
Defendant

: Ms. Becky R. Popson : Home Depot U.S.A.Inc : Daniel Rivera Defendant

Claimant Our Tax I.D. No. : 13-2916296 Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

Previous Outstanding Balance

\$ ...00

Fees for Professional Services Through March 31, 2018

\$ 17,533.50

#### SERVICES SUMMARY

ATTORNEY	HOURS	RATE	TRUOMA
Laurie P. Beatus Arturo Boutin Robert D. Lang Helen McDonald	14.70 73.00 15.20 .30	130.00 175.00 175.00 75.00	1,911.00 12,775.00 2,660.00 22.50
Jerome Smith James Zhu	1.80 .40	75.00 75.00	135.00 30.00 \$ 17,533.50

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR LEGAL SERVICES

Invoice# 570485

April 12, 2018

RE: Home Depot GLSL Rtnr/Rivera, Daniel

Litigation No. : GL-16-11-17780

Claim No. : TBP Date of Loss : TBP

Examiner : Ms. Becky R. Popson
Defendant : Home Depot U.S.A.Inc
Claimant : Daniel Rivera

Claimant : Daniel Rivera
Our Tax I.D. No. : 13-2916296
Our File No. : 930-83092(005)

INTERIM BILL

GL-16-11-17780

To legal services rendered and disbursements advanced during the period of March 1, 2018 through March 31, 2018 ; such legal services consisting of the following:

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
3/01/18	RDL	175.00	.10	L430		Review and analysis of the Judicial Subpoena directed to Home Depot witness Jorge Palacios pursuant to Rule 45 of the Federal Rules of Civil Procedure;
3/01/18	RDL	175.00	2.80	L160	A109	Prepare for mediation by review of pleadings, pre-trial order, deposition testimony and discovery;
3/01/18	AMB	175.00	.30	L160		Continued drafting of Home Depot's confidential mediation statement re: 2/28/18 correspondence from Paul J. Kaplan, Esq. and Mary Loudermilk;
3/01/18	AMB	175.00	.10	L160		Drafting correspondence to federal mediator Dayton P. Haigney, Esq. Re: Home Depot's confidential mediation statement for 3/2/18 mediation;
3/01/18	AMB	175.00	,10	L160		

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	570485	199		Ï	April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
3/01/18	AMB	175.00	.10	L160		
3/01/18	AMB	175.00	.10	L160		Analysis of 3/1/18 correspondence from court mediator Dayton Haigney, Esq. re: Home Depot's confidential mediation statement for 3/2/18
3/01/18	AMB	175.00	.10	L440		mediation; Analysis of plaintiff's counsel's subpoena to Jorge Palacios re:
3/01/18	JXS	75.00	.10	L140		appearance at 3/12/18 trial; Obtain copy of an order, docket due date for parties to submit answer to adjust submission on trial on
3/02/18	RDL	175.00	1.20	L160	A101	3/28/18: Travel to and from mediation (travel time extended due to Nor'easter) (half time);
3/02/18	RDL	175.00	.50	L160	A101	(Hall Cime),
3/02/18	RDL	175.00	7.00	L160	A101	Attend mediation with Paul Kaplan followed by court conference (10:00 a.m 5:00 p.m.);
3/02/18	RDL	175.00	.30	L160	A101	a.m 5:00 p.m.);
3/02/18			1.20			Travel to and from SDNY re: court-ordered mediation; (half time)
3/02/18		175.00	7.20			Appearance in SDNY re: court-ordered mediation, travel time not included;
3/02/18	AMB	175.00	.60	L160		Appearance in SDNY re: Conference with Judge Forrest concerning case settlement status, our application for a finding of a grave injury and

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	570485	(#)		I	April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
						leave to move for summary judgment on Home Depot's contractual and common law indemnification third-party
3/03/18	RDL	175.00	.30	L160	A106	I I
3/04/18	AMB	175.00	4.20	L160		Drafting Home Depot's motion for summary judgment on its contractual and common law indemnification third-party claims re: 3/2/18 court directive [SUNDAY];
3/05/18	RDL	175.00	.10	L230	A103	-
3/05/18	RDL	175.00	,10	L250	A104	Review and analysis of Court Report regarding decision granting oral motion that there is a "grave injury"
3/05/18	RDL	175.00	.10	L240	A103	in the suit;
3/05/18	RDL	175.00	10	L160	A1U4	)
3/05/18	RDL	175.00	.10	L160	A103	gare.
3/05/18	RDL	175.00	.10	L160	A104	

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	570485	.GS		P	April 12, 2018
DATE ATTY	RATE	HOURS T	TASK A	ACT ' Y	
3/05/18 RDL	175.00	.20 I	L240	A104	Review and analysis of the Court Order entered that day directing oral argument on Motion for Summary
3/05/18 RDL	175.00	.10 I	L240	A103	Judgment and indemnification claim;
3/05/18 AMB	175.00	.10 I	L160		Telephone conference with counsel for third-party defendant Bryan's Home Improvement Corp. re: counsel's
3/05/18 AMB	175.00	,10 L	L160		request for Home Depot's settlement position:
3/05/18 AMB	175.00	.10 I	L160		
3/05/18 AMB	175.00	.10 L	L160		Telephone call to counsel for third-party defendant Bryan's Home Improvement Corp. re: notice that Home Depot will consider only a nominal settlement contribution:
3/05/18 AMB	175.00	.10 L	L160		HOMITHAL BELLTEMENT CONCITION TON:

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 186 of 215

930 83092

Ms. Becky R. Popson

FOR	LEGAL SE	RVICES			
Invo	ice#	570485	(4)		April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y
3/05/18	AMB	175.00	.10	L160	Į.
3/05/18	AMB	175.00	.10	L160	Telephone conference with counsel for third-party defendant Bryan's Home Improvement Corp. re: notice that Home Depot will consider only a
3/05/18	AMB	175.00	. 20	L160	nominal settlement contribution;
3/05/18	AMB	175.00	.10	L230	Telephone conference with counsel for third-party defendant Bryan's Home Improvement Corp. re: 3/6/18 Court
3/05/18	AMB	175.00	.10	L130	Conference;
3/05/18	AMB	175.00	3.60	L160	Continued drafting of Home Depot's motion for summary judgment on its contractual and common law indemnification third-party claims re: per Paul J. Kaplan, Esq.'s 3/5/18
3/05/18	AMB	175.00	2.40	L240	comments; Preparation for 3/6/18 argument of Home Depot's motion for summary judgment on contractual and common

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	570485	•			April 12, 2018
DATE ATT	Y RATE	HOURS	TASK	ACT'	
3/05/18 AMB	175.00	.10	L160		law indemnification re: review of Master Service Provider Agreement and plaintiff's and Jorge Palacios' respective deposition transcripts;
3/05/18 AMB	175.00	.10	L160		Analysis of 3/5/18 correspondence from counsel for third-party defendant Bryan's Home Improvement Corp. to mediator Dayton Haigney, Esq. re: canceling 3/9/18 further
3/05/18 AME	175.00	.10	L160		mediation;
3/05/18 AME	175.00	.10	L160		Analysis of 3/5/18 correspondence from mediator Dayton Haigney, Esq. to counsel for third-party defendant Bryan's Home Improvement Corp., copy to me re: cancelled 3/9/18 further
3/05/18 JXS	75.00	.30	L140		mediation; Update attorneys calendar concerning conference on schedule on 3/6/18 @ 10:00 am, with Judge Forrest USDC SDNY:
3/05/18 JXS	75.00	.20	L140		Communicated with USDC-SDNY court reporter regarding obtaining a copy on transcript hearing on 3/2/18:
3/05/18 JXS	75.00	10	L140		Obtain copy of requested transcript dated/2/18:
3/05/18 JXS	75.00	.30	L140		Review letter dated March 5, 2014 to comply with ECF/CM, and USDC e-filing and Judge Forrest e-filing rules:

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	ice#	570485	10		P	pril 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
3/05/18	JXS	75.00	.20	L140		E-filed letter dated 3/5/18 upon Judge Forrest of Southern District New York:
3/06/18	LPB	130.00	.20	L160		Review letter for settlement conference;
3/06/18	LPB	130.00	.20	L250		Review Order granting SJ on grave injury issue;
3/06/18	LPB	130.00	.10	L160		injury issue,
3/06/18	LPB	130.00	.30	L250		Review Order granting SJ on indemnification;
3/06/18 3/06/18	AMB	130.00 175.00	.70	L230 L240		Review transcript of the 3/2 hearing; Travel to and from SDNY re: argument of Home Depot's motion for summary judgment for contractual and common law indemnification as against third-party defendant Bryan's Home Improvement Corp.; (half time) Appearance in SDNY re: argument of Home Depot's motion for summary judgment for contractual and common law indemnification as against third-party defendant Bryan's Home Improvement Corp., travel time not
3/06/18	AMB	175.00	.10	L240		included;
3/06/18	AMB	175.00	.10	L240		ere.

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	570485	590		April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y
3/06/18	AMB	175.00	.20	L240	
3/06/18	AMB	175.00	.10	L240	
3/06/18	AMB	175.00	.50	L240	Bryan's Home Improvement Corp.'s letter motion to reconsider re: 3/6/18 Order granting of Home Depot's motion for summary judgment for
3/07/18 3/07/18		130.00 175.00		L250 L240	Analysis of third-party defendant Bryan's Home Improvement Corp. letter motion to reconsider re: 3/6/18 Order granting Home Depot's summary
3/07/18	AMB	175.00	1.30	L240	judgment motion for contractual and common law indemnification; Analysis of third-party defendant Bryan's Home Improvement Corp. case law in support of letter motion to reconsider re: 3/6/18 Order granting Home Depot's summary judgment motion for contractual and common law
3/08/18	LPB	130.00	, 30	L240	indemnification; .

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	_ce#	570485	(4)		I	April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
3/08/18 3/08/18		130.00		L160 L160		argument of HD's motion for SJ; Review the Magistrate's rules; Telephone conference with Magistrate Wang regarding settlement conference
3/08/18	RDL	175.00	.,20	L160	A104	to be scheduled; Review and analysis of the March 8, 2018 court report regarding referring the case to Magistrate Judge Wang for settlement;
3/08/18	AMB	175.00	.70	L240		Analysis of court minutes of 3/6/18 argument of Home Depot's summary judgment motion for contractual and common law indemnification re:
						preparation for appearance at 3/8/18 Trial Conference;
3/08/18	AMB	175.00	.10	L240		Analysis of 3/8/18 correspondence from plaintiff's counsel to the Court, copy to me re: status of settlement or any agreement to enter
3/08/18	AMB	175.00	.70	L240		judgment; Analysis of 3/8/18 Memorandum Decision and Order re: denial of third-party defendant Bryan's Home Improvement Corp.'s motion to reconsider granting of Home Depot's summary judgment motion for contractual and common law indemnification;
3/08/18	AMB	175.00	. 90	L240		

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

## FOR LEGAL SERVICES

Invoice# 570485 April 12, 2018

DATE ATTY RATE HOURS TASK ACT'Y

3/08/18 AMB 175.00 .10 L240

3/08/18 AMB 175.00 .10 L240 Analysis of 3/8/18 correspondence from counsel for third-party

	FOR	LEGAL	SERVICES
--	-----	-------	----------

Invoi	.ce#	570485	:#5		I	April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
3/08/18	AMB	175.00	.10	L240		defendant Bryan's Home Improvement Corp. re: proposed appearance for court-ordered settlement conference on damages on case; Analysis of 3/8/18 correspondence from plaintiff's counsel re: proposed appearance for court-ordered settlement conference on damages on
3/08/18	AMB	175.00	.10	L240		case; Drafting correspondence to opposing counsel re: proposed appearance for court-ordered settlement conference
3/08/18	AMB	175.00	.40	L240		on damages on case;
3/08/18	AMB	175.00	.10	L240		Analysis of 3/8/18 correspondence from plaintiff's counsel re: telephone conference with Magistrate Wang in preparation for court-ordered
3/08/18	НЈМ	75.00	.30	L110		settlement conference on damages on case; Review and analysis and analysis of Westlaw search engine to obtain cases referenced in Bryan's Home Improvement Corp.'s letter to
3/09/18	AMB	175.00	.10	L160		Honorable Forrest dated April 5, 2018, to assist attorney in factual investigation and case assessment; Analysis of 3/9/18 correspondence from Magistrate Judge Wang re: 3/12/18 telephone conference concerning court-ordered settlement conference on damages;
3/09/18	AMB	175.00	.20	L160		conference on damages,

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoic	e#	570485	piči.		I	April 12, 2018
DATE A	TTY	RATE	HOURS	TASK	ACT'Y	
3/09/18 J	ſΖ	75.00	.10	L320		Telephone conference with The Back Institute re: follow-up for plaintiff's records;
3/09/18 J	ΓZ	75.00	.10	L320		Voice message to Bryan Home Improvement Corp. re: follow-up for plaintiff's records;
3/09/18 J	rz	75.00	.10	L320		Telephone conference with Dr. Michael Seidenstein's office re: follow-up for plaintiff's records;
3/09/18 J	ΓZ	75.00	.10	L320		Telephone conference with Workers' Compensation Board re: follow-up for additional plaintiff's claim records;
3/12/18 L	∟PB	130.00	.70	L160		Draft letter to Magistrate regarding submission required by the Court for the settlement conference;
3/12/18 R	RDL	175.00	.20	L430	A104	Review and analysis of the March 12, 2018 court order by Judge Forrest regarding x-ray films from Ironbound MRI received in court for trial;
3/12/18 A	AMB	175.00	.50	L160	; ; ;	Preparation for 3/12/18 telephone conference with Magistrate Wang re: review of court orders and court minutes concerning the granting of contractual and common law indemnification to Home Depot;
3/12/18 A	√MB	175.00	. 70	L160		Telephone conference with Magistrate Wang and opposing counsel re: parties respective settlement positions in preparation for 3/15/18 settlement conference;
3/12/18 A	AMB	175.00	. 20	L160		Drafting additions to correspondence to Magistrate Wang re: request that Paul J. Kaplan, Esq. appear by telephone at 3/15/18 settlement

FOR	LEGAL	SERVICES
-----	-------	----------

Invo	ice#	570485	,		I	April 12,	2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y		
3/12/18	AMB	175.00	2.20	L160		conference; Drafting settlement position statement per Magistrate Wang's 3/12/18 directive re: Home Depot	settlement position t per Magistrate Wang's directive re: Home Depot's
3/12/18	AMB	175.00	.70	L160		settlement for 3/15	nt positions in preparation /18 settlement conference;
3/12/18	AMB	175.00	.10	L440		receipt (	of 3/12/18 Order re: Court's of x-ray records from
3/12/18	AMB	175.00	.10	L160		Ironbound MRI and directive for plaintiff's counsel to retrieve	
3/12/18	AMB	175.00	.10	L160			
3/12/18	AMB	175.00	<u>;</u> 10	L160		from Mag	of 3/12/18 Scheduling Order istrate Wang re: parties ve settlement positions in ion for 3/15/18 settlement
3/12/18	AMB	175.00	.10	L160		conferen	

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 195 of 215

930 83092

Ms. Becky R. Popson

FOR	LEGAL SER	VICES					
Invo	ice#	570485			Apı	ril 12, 2018	
DATE	ATTY	RATE	HOURS	TASK	ACT ' Y		
3/12/18	AMB	175.00	.10	L160			
3/12/18	AMB	175.00	.10	L160			,
3/13/18	LPB	130.00	.20	L160	fo	raft email to Judge Wang regarding orwarding the mediation statement	
3/13/18	AMB	175.00	.40	L160	ar	nd supporting documents;	
3/13/18	AMB	175.00	1.40	L160	se Pa	entinued drafting of Home Depot ettlement position statement re: aul J. Kaplan, Esq.'s additions and emments in preparation for 3/15/18	
3/13/18	AMB	175.00	.20	L340	se Ar Br 3/	ettlement conference; lalysis of third-party defendant ryan's Home Improvement Corp.'s 13/18 Expert Disclosure re:	
3/13/18	AMB	175.00	.20	L340	n∈	eurologist Dr. Richard Lechtenberg;	
3/13/18	AMB	175.00	10	L340			

April 12, 2018

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoice# 570485

DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
3/13/18	AMB	175.00	.10	L340		
3/13/18	AMB	175.00	.90	L210		
3/13/18	AMB	175.00	.10	L160		C
3/13/18	AMB	175.00	.10	L160		Analysis of 3/14/18 vmm from Magistrate Wang's Chambers re: request for return call to the Court concerning 3/15/18 court-ordered settlement conference;
3/14/18	LPB	130.00	1.20	L160		Prepare for settlement conference including reviewing previous orders and granting of summary judgment;
3/14/18 3/14/18		130.00 175.00		L190 L160		Review Magistrate Wang's order; Analysis of 3/14/18 correspondence from plaintiff's counsel re: request for transcript of 3/6/18 argument of Home Depot's motion for summary judgment for use at 3/15/18 court-ordered settlement conference;
3/14/18	AMB	175.00	.10	L160		Drafting response to 3/14/18

ROR	T.ECAT.	SERVICES

Invo	ice#	570485	ri e			April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'	ď.
						correspondence from plaintiff's counsel re: request for transcript of 3/6/18 argument of Home Depot's motion for summary judgment for use at 3/15/18 court-ordered settlement conference;
3/14/18	AMB	175.00	.10	L160		Analysis of 3/14/18 correspondence from plaintiff's counsel re: status of plaintiff's submission of his settlement position statement;
3/14/18	AMB	175.00	.10	L160		Telephone conference with Magistrate Wang's Law Clerk re: Magistrate Wang's requirement of a letter requesting Paul J. Kaplan, Esq. to attend 3/15/18 court-ordered settlement conference by telephone;
3/14/18	AMB	175.00	.90	L160		Analysis of plaintiff's Settlement Conference Summary re: plaintiff's claimed injuries and expert reports in support in preparation for 3/15/18 court-ordered settlement conference;
3/14/18	AMB	175.00	.40	L160		
3/14/18	AMB	175.00	.10	L160		
3/14/18	AMB	175.00	.10	L160		
3/14/18	AMB	175.00	.10	L160		

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	Lce#	570485	,			April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
3/14/18	AMB	175.00	.10	L160		Analysis of 3/14/18 Memo Endorsement correspondence from Magistrate Wang re: approval of Paul J. Kaplan, Esq.'s appearance at 3/15/18
3/14/18	AMB	175.00	.10	L160		court-ordered settlement conference by telephone; Analysis of 3/14/18 Order from Magistrate Wang re: directive to third-party defendant Bryan's Home improvement Corp. to be ready to discuss funding of a settlement at 3/15/18 court-ordered settlement
3/14/18	AMB	175.00	.40	L160		3/15/18 court-ordered settlement conference;
3/14/18	AMB	175.00	.10	L160		Analysis of 3/14/18 Notice of Filing Official Transcript re: 3/6/18 hearing and start of 7 day period to request redaction of transcript;
3/14/18	AMB	175.00	.40	L230		Telephone conference with plaintiff's counsel re: third-party defendant Bryan's Home Improvement Corp.'s 3/14/18 request to stipulate to allow Dr. Lechtenberg's IME report in prior to 3/15/18 settlement conference with

ROB	LECAL.	SERVICES
FUR	LEGAL	SEKATCES

Invo	ice#	570485	•		April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y
3/14/18	AMB	175.00	.40	L230	Maqistrate Wang;
3/14/18	JXS	75.00	.20	L140	Communicated with SDNY regarding transcript order on 3/5/18, was placed on hold for several minutes:
3/15/18	LPB	130.00	4.50	L160	±
3/15/18	LPB	130.00	.70	L160	
3/15/18	LPB	130.00	.10	L160	
3/15/18	AMB	175.00	.70	L230	Travel to and from SDNY re: argument of Home Depot's motion for summary judgment for contractual and common law indemnification as against third-party defendant Bryan's Home Improvement Corp.; (half time)
3/15/18	AMB	175.00	4.80	L230	
3/15/18	AMB	175.00	.20	L230	
3/15/18	AMB	175.00	.20	L440	

930 83092

Ms. Becky R. Popson

FOR	LEGAL	SERVICES

Invo	ice#	570485	al.			April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'	Y
3/15/18	AMB	175.00	.20	L450		Telephone conference with plaintiff's counsel re: issue of proceeding with trial with Judge Forrest or
3/15/18	AMB	175.00	.10	L450		Magistrate Wang; Analysis of 3/15/18 correspondence from Third-Party Defendant Bryan's Home Improvement Corp.'s counsel re:
3/15/18	AMB	175.00	.10	L450		their consent to proceed with trial with Magistrate Wang;
3/15/18	AMB	175.00	.10	L450		
3/16/18	AMB	175.00	.10	L450		Analysis of 3/16/18 correspondence from plaintiff's counsel re: their consent to proceed with trial with
3/16/18	AMB	175.00	.30	L450		Magistrate Wang; Analysis of 3/16/18 Order from Judge Forrest re: granting plaintiff leave to move for summary judgment on economic damages claim and setting trial for only pain and suffering
3/16/18	AMB	175.00	.30	L450		<pre>claim; Telephone conference with plaintiff's counsel re: 3/16/18 Order from Judge Forrest granting plaintiff leave to move for summary judgment on economic damages claim and setting trial for only pain and suffering claim;</pre>

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	570485	:5:			April	12,	2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y			
3/16/18	AMB	175.00	.40	L450				
3/16/18	AMB	175.00	10	L450				
3/16/18	AMB	175.00	.10	L450		from Home reque	thin Impo	of 3/16/18 correspondence rd-party defendant Bryan's rovement Corp.'s counsel re: for Home Depot's position on
3/16/18	AMB	175.00	.10	L450		Wang; Telep defer Corp.	hone dant	ne case before Magistrate e conference with third-party t Bryan's Home Improvement counsel re: request for Home cosition on trying the case
3/16/18	AMB	175.00	.10	L450		before Teleptocouns Bryan couns Depote	re Ma phone sel m r's H sel's	agistrate Wang; conference with plaintiff's re: third-party defendant Home Improvement Corp.'s 3/16/18 request for Home position on trying the case
3/16/18	AMB	175.00	.30	L450				

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	570485	185		Ī	April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
3/16/18	AMB	175.00	.10	L450		Further telephone conference with plaintiff's counsel re: third-party defendant Bryan's Home Improvement Corp.'s counsel's 3/16/18 request for
3/16/18	AMB	175.00	.10	L450		Home Depot's position on trying the case before Magistrate Wang; Analysis of 3/16/18 correspondence
3/16/18	AMB	175.00	.10	L450		
3/16/18	AMB	175.00	.20	L450		Telephone conference with plaintiff's counsel re: plaintiff's position that the case will be tried before
3/16/18	AMB	175.00	.10	L450		District Judge Forrest;
3/16/18	AMB	175.00	.10	L450		Analysis of plaintiff's counsel 3/16/18 correspondence re: plaintiff's position that the case

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	570485	(40		Ī	April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
3/16/18	AMB	175.00	.10	L450		will be tried before District Judge Forrest;
3/16/18	AMB	175.00	.10	L450		Dratting correspondence to all parties re: Home Depot's acknowledgement of plaintiff's position that the case will be tried
3/16/18	AMB	175.00	.10	L450		before District Judge Forrest; Analysis of plaintiff's counsel 3/16/18 correspondence to Magistrate Wang re: plaintiff's position that the case will be tried before
3/19/18	AMB	175.00	.10	L240		District Judge Forrest; Analysis of 3/19/18 correspondence from plaintiff's counsel to Court, copy to me re: notice of plaintiff's intent to move for summary judgment
3/19/18	JXS	75.00	<b>#10</b>	L140		on his economic damages claim; Obtain copy of letter filed by plaintiff dated 3/19/18,
3/20/18	LPB	130.00	.20	L440		Review Order of the court regarding trial and submissions;
3/20/18	AMB	175.00	.40	L440	A104	Analysis of 3/20/18 Order re: trial scheduling activities, including motions in limine, pretrial material submissions and joint pretrial order;
3/21/18	LPB	130.00	.10	L240		Review letter from PC to the court regarding msj to be made by PC;
3/21/18	AMB	175.00	.40	L240		

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoi	.ce#	570485	(#)		April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	C ACT'Y
3/21/18	AMB	175.00	.10	L240	
3/22/18	LPB	130.00	.80	L250	Review letters to the Court by SIF and PC regarding the motion to open up discovery;
3/22/18	AMB	175.00	.90	L250	Analysis of third-party defendant Bryan's Home Improvement Corp.'s
3/22/18	AMB	175.00	.30	L250	3/22/18 letter motion re: request to reopen expert discovery based on medical records exchanged by plaintiff's counsel on 3/20/18; Analysis of plaintiff's counsel 3/22/18 opposition to third-party defendant Bryan's Home Improvement Corp.'s 3/22/18 letter motion to reopen expert discovery re: argument
3/22/18	AMB	175.00	1.50	L250	that medical records exchanged by plaintiff's counsel on 3/20/18 were part of his continuing treatment;
3/23/18	LPB	130.00	.10	L160	
3/23/18	LPB	130.00	1.60	L250	Review motion fro summary judgment memo of law and supporting
3/23/18	AMB	175.00	.50	L250	declaration by PL;  Drafting letter motion to Court re: request for Home Depot to be excused from participating in the 4/9/18

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 205 of 215

930 83092

Ms. Becky R. Popson

ROB	T.ECAT.	SERVICES
rvr	TEGUT	DEKATCHO

Invo	ice#	570485	:93		April 12,	2018	
DATE	ATTY	RATE	HOURS	TASK	ACT'Y		
3/23/18	AMB	175.00	.90	L250	trial;		
8							
3/23/18	AMB	175.00	.10	L250			
3/23/18	AMB	175.00	.10	L250			
3/23/18	AMB	175.00	.10	L250			
3/23/18	AMB	175.00	.10	L250	of third Improvem	l-party defendent Corp.'s	Order re: denial dant Bryan's Home letter motion to
3/23/18	AMB	175.00	. 90	L250	Analysis motion f	or summary j	f's counsel's udgment re: economic damages

FOR	LEGAL SE	RVICES				
Invo	ice#	570485			I	April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
3/23/18	JXS	75.00	.30	L140		which would then limit the trial to pain and suffering; Reviewed Judge Forrest and USDC-SDNY e-filing rules to comply with filling letter motion:
3/24/18	RDL	175.00	.20	L350	A103	letter motion:
3/24/18	AMB	175.00	. 10	L250		
3/24/18	AMB	175.00	.10	L250		
3/26/18	LPB	130.00	. 10	L250		Review motion in limine by PC and by Bryans;
3/26/18	LPB	130.00	20	L440		Telephone call with HD regarding Court's non commitment to HD not
3/26/18	LPB	130.00	. 30	L250		appearing at the trial; Telephone call with PC regarding manner in which to proceed;
3/26/18	LPB	130.00	.80	L250		Review Bryan's amended motion in limine and memo in support of the
3/26/18	RDL	175.00	.70	L430	A101	motion;
3/26/18	RDL	175.00	. 20	L430	A106	

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 207 of 215

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	570485	160		1	April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
3/26/18	AMB	175.00	.10	L250		Analysis of 3/26/18 Order re: notice that it is Home Depot's decision whether or not to participate at
3/26/18	AMB	175.00	.50	L250		trial;
3/26/18	AMB	175.00	.10	L440		
3/26/18	AMB	175.00	.10	L440		
3/26/18	AMB	175.00	.10	L440		
2/26/20	7) M.D.	175 00	4.0	T 4 4 0		
3/26/18	AMB	1/5.00	.40	1.440		

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	570485	:=1		I	April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
3/26/18	AMB	175.00	.10	L440		
3/26/18	AMB	175.00	.30	L440		Telephone conference with plaintill's counsel re: Home Depot's decision to participate at trial, status of joint pretrial Order and any settlement negotiations with counsel for
3/26/18	AMB	175.00	.40	L440		third-party defendant Bryan's Home improvement Corp.;
3/26/18	λMB	175.00	10	L440		
3/20/10	AMD	173.00	*10	П440		
3/27/18	LPB	130.00	.10	L240		Review letter from PC to the court regarding msj to be made;
3/27/18	RDL	175.00	.30	L310	A104	Review and analysis of the March 20, 2018 correspondence from counsel for plaintiff providing new records received from Alpha 3T MRI Diagnostic
3/27/18	RDL	175.00	.30	L340	A104	Imagining of March 16, 2018 regarding new medical treatment for plaintiff; Review and analysis of the March 20, 2018 5 page letter from counsel for third-party defendant to Judge Forrest and to re-open expert discovery based upon the service of

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

Invoi	lce#	570485	18			April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
3/27/18	AMB	175.00	1.10	L250	*.	the new expert report exchanged by plaintiff; Analysis of third-party defendant Bryan's Home Improvement Corp.'s motion in limine re: preclusion of testimony or evidence relating to
3/29/18	LPB	130.00	.30	L250		quantitative electroencephalography; Review letter motion by Bryan's regarding precluding expert's affidavits;
3/29/18	LPB	130.00	20	L250		Review motion in limine by PC and by Bryans;
3/29/18	LPB	130.00	. 20	L250		Review opposition by PC to Bryan's motion in limine;
3/29/18		175.00		L250		Analysis of third-party defendant Bryan's Home Improvement Corp.'s motion to strike plaintiff's expert affidavits re: argument that they were submitted after discovery deadline for affirmative expert exchange to support plaintiff's motion for summary judgment on economic damages;
3/29/18	AMB	175.00	.70	L250		

3/29/18 AMB 175.00 .10 L250

April 12, 2018

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

## FOR LEGAL SERVICES

Invoice# 570485

RATE HOURS TASK ACT'Y

ATTY

DATE

3/30/18	AMB	175.00	.40	L440	Analysis of plaintiff's proposed Joint Pre-Trial Order re: trial schedule, stipulated facts and law, witnesses, exhibits, motions in limine, voir dire, verdict form and
3/30/18	AMB	175.00	.70	L440	requests to charge; Analysis of plaintiff's voir dire submissions re: authorized appearance at 4/9/18 jury selection and trial;
3/30/18	AMB	175.00	1.20	L440	Analysis of plaintiff's Request to Charge re: authorized appearance at
3/30/18	AMB	175.00	.30	L440	4/9/18 jury selection and trial; Analysis of plaintiff's Jury Interrogatories re: award for past and future medical expenses and pain
3/30/18	AMB	175.00	.50	L440	and future medical expenses and pain and suffering in preparation for authorized appearance at 4/9/18 jury selection and trial; Analysis of third-party defendant Bryan's Home improvement Corp.'s proposed Joint Pre-Trial Order re: trial schedule, stipulated facts and law, witnesses, exhibits, motions in
3/30/18	AMB	175.00	.90	L440	limine, voir dire, verdict form and requests to charge; Analysis of third-party defendant Bryan's Home improvement Corp.'s voir dire submissions re: authorized appearance at 4/9/18 jury selection
3/30/18	AMB	175.00	.50	L440	and trial; Analysis of third-party defendant Bryan's Home improvement Corp.'s

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	ice#	570485			I	April 12, 2018
DATE	ATTY	RATE	HOURS	TASK	ACT'Y	
3/30/18	AMB	175.00	.50	L440		proposed Jury Verdict Instructions re: finding that plaintiff has total loss of use of his arm or hand and brain injury resulting in total permanent disability in preparation for authorized appearance at 4/9/18 jury selection and trial; Analysis of third-party defendant Bryan's Home improvement Corp.'s objections to plaintiff's exhibits re: submission of records and reports from plaintiff's medical experts who will testify at trial in preparation for authorized appearance at 4/9/18
3/30/18	AMB	175.00	.10	L440		for authorized appearance at 4/9/18 jury selection and trial; Analysis of third-party defendant Bryan's Home improvement Corp.'s objection to plaintiff's PJI 1:75 jury charge re: failure to call Dr. Richard Lechtenberg in preparation for authorized appearance at 4/9/18
3/30/18	a AMB	175.00	3.80	L440		jury selection and trial; Analysis of third-party defendant Bryan's Home improvement Corp.'s Exhibits re: revocation action and statement of charges against Dr. Paul K. Ratzker and United States District Court bond, sealed indictments concerning matter of United States of America v. Gordon Freedman, et al. in
3/30/18	3 AMB	175.00	.50	L440		preparation for authorized appearance at 4/9/18 jury selection and trial and transcript of 2/23/16 trial videotape deposition for Dr. Paul J. Kleinman; Telephone conference with plaintiff's counsel re: objection to third-party defendant Bryan's Home improvement

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 212 of 215

930 83092

\$ .00

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

#### FOR LEGAL SERVICES

NET FEES

Invoice#		570485	TK:			April 12, 2018	
DATE	ATTY	RATE	HOURS	TASK	ACT'		
3/30/18	AMB	175.00	. 50	L440		Corp.'s proposed Jury Verdict Instructions concerning finding that plaintiff has total loss of use of his arm or hand and brain injury resulting in total permanent disability, including Jorge Palacios as a witness in proposed Joint Pre-Trial Order, as well as status of any settlement negotiations with Bryan's counsel; Analysis of third-party defendant Bryan's Home improvement Corp.'s opposition to plaintiff's summary judgment motion on economic damages claim re: continuing authorized tria	s of
3/30/18	AMB	175.00	.20	L440		preparation; Analysis of plaintiff's counsel's 3/30/18 letter reply re: response third-party defendant Bryan's Homimprovement Corp.'s opposition to plaintiff's summary judgment motion economic damages claim for continuing authorized trial preparation;	
TOTAL F	EES	• * * * * * * * * * * * * * * * * * * *		e e e e e		\$ 17,533.5	0

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invoice#	570485			April 12, 2018
DATE RATE		UNITS	TASK	NT EXPENSE NAME
3/01/18 3/01/18 3/01/18 3/02/18 3/02/18	.10 .10 .10	51.00 245.00 1.00 2.00	E101 E101 E101 E101 E121	5.10 Duplicating 24.50 Duplicating .10 Duplicating .20 Duplicating 38.55 Mediation - SDNY Foley Square - with Paul Kaplan As per Robert D. Lang
3/05/18	.10	12.00	E101	1.20 Duplicating - BEATUS LAURIE
3/05/18 3/05/18 3/05/18 3/05/18 3/05/18	.10 .10 .10 .10	3.00 3.00 1.00 1.00 13.00	E101 E101 E101 E101 E101	.30 Duplicating .30 Duplicating .10 Duplicating .10 Duplicating 1.30 Duplicating - BEATUS
3/05/18	.10	19.00	E101	LAURIE  1.90 Duplicating - BEATUS LAURIE
3/05/18	.25	4.00	E104	1.00 Telecopier -Out, Phone#: (212) 267-4262
3/05/18	.25	4.00	E104	1.00 Telecopier -Out, Phone#: (184) 421-717*
3/07/18 3/08/18	.10	2.00 12.00	E101 E101	.20 Duplicating 1.20 Duplicating - MCDONALD HELEN
3/08/18 3/08/18 3/09/18 3/12/18	.10 .10 .10	2.00 2.00 1.00 102.00	E101 E101 E101 E101	.20 Duplicating .20 Duplicating .10 Duplicating 10.20 Duplicating - MALDONADO MIRIAM
3/12/18 3/12/18	10	1.00	E101 E101	.10 Duplicating 1.40 Duplicating - BEATUS
3/12/18 3/12/18 3/12/18 3/13/18 3/13/18 3/13/18	.10 .10 .10 .10 .10	14.00 2.00 2.00 3.00 3.00 34.00	E101 E101 E101 E101 E101	LAURIE  1.40 Duplicating .20 Duplicating .20 Duplicating .30 Duplicating .30 Duplicating .30 Duplicating .30 Duplicating

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

Invo	oice#	570485	146		April 12, 20	18
DATE	RATE		UNITS	TASK	NT EXP	ENSE NAME
3/13/18	3			E115	141.48	MIRIAM Transcripts - Job Date:
						03/06/18 Case No. 16CV07552 - Arturo M. Boutin
3/14/18		.10	2 . 00	E101	.20	Duplicating
3/14/18		.10	5,00	E101	.50	
3/14/18	3	.10	36.00	E101	3.60	LAURIE
3/14/18	3	.10	27.00	E101	2.70	Duplicating - BEATUS LAURIE
3/14/18	8	.10	12.00	E101	1.20	Duplicating - BEATUS LAURIE
3/14/18	8	.10	12.00	E101	1.20	
2/25/2	0	.10	1.00	E101	10	Duplicating
3/15/18			3.00	E101	.75	
3/23/18	8	.25				(844) 217-17**
3/23/18	8	<b>~25</b>	3.00	E104	.75	Telecopier -Out, Phone#: (212) 267-4262
3/26/18	8			E105	.64	(OUTGOING), Phone#: (504)
					1 00	638-9011
3/27/1		.10	17.00	E101	1.70	_
3/27/1		.10	4.00	E101	.40	
3/27/1		.10	4.00	E101	. 40	
3/30/1	8	.10	120.00	E101	12.00	Duplicating - BOUTIN ARTURO M.
3/30/1	8	.10	110.00	E101	11.00	Duplicating - BOUTIN ARTURO M.
3/30/1	8	.10	110.00	E101	11.00	
3/30/1 3/31/1		.10	7.00	E101 E100	.70	Duplicating

# Case 1:16-cv-07552-JGK Document 169-4 Filed 05/24/18 Page 215 of 215

930 83092

Ms. Becky R. Popson

D'Amato & Lynch, LLP Two World Financial Center New York, NY 10281

FOR LEGAL SERVICES

Invoice# 570485

April 12, 2018